

EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X

CHARLENE TALARICO, individually and on behalf of a
class of all others similarly situated;;

PLAINTIFFS,

-against-

Index No.:

00909(JPO)

THE PORT AUTHORITY OF NEW YORK AND NEW JERSEY,

DEFENDANTS.

-----X

DATE: August 14, 2020

TIME: 10:14 A.M.

EXAMINATION BEFORE TRIAL of the PLAINTIFF,
CHARLENE TALARICO, taken by the DEFENDANTS, pursuant
to a COURT ORDER, held at the offices of The Port
Authority of NY & NJ 10006, before Danielle S.
Battle, a Notary Public of the State of New York.

1 A P P E A R A N C E S:

2

ADVOCATES FOR JUSTICE

3 Attorneys for the Plaintiffs

CHARLENE TALARICO

4 225 Broadway, Suite 1902

New York, New York 10007

5 BY: RICHARD SOTO, ESQ.

6

7 PORT AUTHORITY LAW DEPARTMENT

Attorneys for the Defendants

8 THE PORT AUTHORITY OF NEW YORK AND NEW
JERSEY

9 4 World Trade Center

150 Greenwich Street, 24th Floor

10 New York, New York 10007

BY: DAVID KROMM, ESQ.

11

12

13 ALSO PRESENT:

14 VIDEOGRAPHER - JON WATTS FROM MAGNA

15 ALSO LISTENING IN THROUGH WEBX - LAUREN GRODENTIZIK
FROM ADVOCATES FOR JUSTICE

16 * * *

17

18

19

20

21

22

23

24

25

221. UNIFORM RULES FOR THE
CONDUCT OF DEPOSITIONS

221.1 Objections at Depositions

(a) Objections in general. No objections shall be made at a deposition except those which, pursuant to subdivision (b), (c) or (d) of Rule 3115 of the Civil Practice Law and Rules, would be waived if not interposed, and except in compliance with subdivision (e) of such rule. All objections made at a deposition shall be noted by the officer before whom the deposition is taken, and the answer shall be given and the deposition shall proceed subject to the objections and to the right of a person to apply for appropriate relief pursuant to Article 31 of the CPLR.

(b) Speaking objections restricted.

Every objection raised during a deposition shall be stated succinctly and framed so as not to suggest an answer to the deponent and, at the request of the questioning attorney, shall include a clear statement as to any defect in form or other basis of error or irregularity. Except to the extent permitted by CPLR Rule 3115 or by this rule, during the course of the examination persons in attendance shall not make statements or comments that interfere with the questioning.

221.2 Refusal to answer when objection is made A deponent shall answer all questions at a deposition, except (i) to preserve a privilege or right of confidentiality, (ii) to enforce a limitation set forth in an order of the court, or (iii) when the question is plainly improper and would, if answered, cause significant prejudice to any person. An attorney shall not direct a deponent not to answer except as provided in CPLR Rule 3115 or this subdivision. Any refusal to answer or direction not to answer shall be accompanied by a succinct and clear statement of the basis therefor. If the deponent does not answer a question, the examining party shall have the right to complete the remainder of the deposition.

221. UNIFORM RULES FOR THE
CONDUCT OF DEPOSITIONS

221.3 Communication with the deponent

An attorney shall not interrupt the deposition for the purpose of communicating with the deponent unless all parties consent or the communication is made for the purpose of determining whether the question should not be answered on the grounds set forth in section 221.2 of these rules and, in such event, the reason for the communication shall be stated for the record succinctly and clearly.

IT IS FURTHER STIPULATED AND AGREED that the transcript may be signed before any Notary Public with the same force and effect as if signed before a clerk or a Judge of the court.

IT IS FURTHER STIPULATED AND AGREED that the examination before trial may be utilized for all purposes as provided by the CPLR.

IT IS FURTHER STIPULATED AND AGREED that all rights provided to all parties by the CPLR cannot be deemed waived and the appropriate sections of the CPLR shall be controlling with respect hereto.

IT IS FURTHER STIPULATED AND AGREED by and between the attorneys for the respective parties hereto that a copy of this examination shall be furnished, without charge, to the attorneys representing the witness testifying herein.

1 C H A R L E N E T A L A R I C O, called as a
2 witness, having been first duly sworn by a Notary
3 Public of the State of New York, was examined and
4 testified as follows:

5 EXAMINATION BY

6 MR. KROMM:

7 Q. Please state your name for the record.

8 A. Charlene Talarico.

9 Q. Please state your address for the record.

10 A. 207 Lawrence Drive, Paramus, New Jersey
11 107652.

12 Q. Thank you. Good morning Ms. Talarico,
13 first am I pronouncing it right?

14 A. Talarico.

15 Q. Thank you. Good Morning Ms. Talarico, as I
16 noted my name is David Kromm, I'm an attorney with
17 the Port Authority of New York and New Jersey and
18 we're here today just to ask you some questions
19 about the incidents of August 4, 2016. However,
20 before I begin, I just want to note for the record,
21 Mr. Soto this deposition today is being conducted
22 live and in person here at the Port Authority
23 offices at your request, is that correct?

24 MR. SOTO: Yes.

25 MR. KROMM: And the option for a zoom or

1 some other form of virtual deposition was
2 something that you did not agree to, you wanted
3 to conducted this deposition in person,
4 correct?

5 MR. SOTO: That is correct.

6 MR. KROMM: And is that something that you
7 have discussed with your client, Ms. Talarico?

8 MR. SOTO: Without revealing the character
9 of any discussions or any client communications
10 it was discussed.

11 Q. And Ms. Talarico, do you also agree that
12 you are here today because you wanted to do this
13 deposition live and in person at the Port Authority
14 Corporate offices?

15 A. Yes.

16 Q. And that you did not want to conduct this
17 deposition via zoom or some other form of virtual
18 deposition?

19 A. No, I did not want to.

20 Q. So today I just want to go over a couple
21 of real quick real ground rules before we get
22 started, I'd just ask that you know, I'm going to be
23 asking you a series of questions today and I'd just
24 ask that you let me finish the question before you
25 start your answer just because as you see, we have a

1 court reporter here who is going to be trying to get
2 everything down and if we start talking over each
3 other that's something that she's not going to be
4 able to get a good transcript, for okay -- that
5 brings me to another instruction. Just if you could
6 answer all of the questions verbally as in yes or no
7 or something else, no, um-hmm, uh-uh or anything
8 like that, is that okay?

9 A. Sure.

10 Q. If you could -- if you need a break at any
11 point, please let us know and we're happy to
12 accommodate that, I'd just ask that if there's a
13 question that is pending, I'd just ask that you give
14 an answer to the question and then we can take a
15 break, do you understand?

16 A. Yup.

17 Q. Is there anything that -- are you
18 currently taking any types medications or anything
19 that would effect your ability to recall or give a
20 truthful and accurate testimony here today?

21 A. No.

22 Q. Ms. Talarico, you are currently employed
23 by the Port Authority, is that correct?

24 A. Yes.

25 Q. And how long have you been employed by the

1 Port Authority?

2 A. I started on January 5, 2009.

3 Q. And your current title with the Port
4 Authority is what?

5 A. I'm a C21, I'm not quite sure senior
6 administrator secretary, maybe, I'm not sure.

7 Q. And where is your office located
8 currently?

9 A. I work in the office of the chief of
10 security otherwise known as police head quarters.

11 Q. And is that at 241 Erie Street in Jersey
12 City?

13 A. PATC, yup.

14 Q. And who is your immediate supervisor at
15 the CSO's office?

16 A. I guess you want to say Waylon Munson
17 [sic].

18 Q. And how long have you been working at the
19 CSO offices at PATC?

20 A. Well, they pushed me out of work at the
21 Lincoln Tunnel from June until October so, I think
22 the date I went back was October 12, 2016.

23 MR. SOTO: Can we just get a clarification
24 of what PATC is for the record?

25 Q. Ms. Talarico, do you know what the term

1 PATC means?

2 A. Port Authority Technical Center.

3 Q. So is it fair to say that you've been
4 working at the CSO's office at the tech center since
5 October of 2016?

6 A. Best of my recollection, I think that's
7 the date.

8 Q. And has your job title changed at all
9 since October of 2016?

10 A. No -- excuse me, a title meaning my C21,
11 is that what we're talking about, is that what he
12 means?

13 Q. I can rephrase the question. When I say
14 your job title, I mean your position, your function
15 at the CSO's office I believe you had mentioned
16 something about a senior administrator assistant?

17 A. So just the C21 title, no, that hasn't
18 changed in many years.

19 Q. But your role in terms of what it is your
20 daily functions at the CSO's office, has that
21 changed at all since October of 2016?

22 A. Yes.

23 Q. Can you briefly describe how so?

24 A. It's nothing to do with what I did when I
25 was at the Lincoln Tunnel, it's a totally different

1 job with totally different responsibilities.

2 Q. Understood. But when you first went to
3 the CSO's office in October of 2016, they gave you a
4 set of responsibilities or duties that you were to
5 handle while you were working there?

6 A. Yeah, well, at first I did petty cash and
7 then after months, they had me start doing the
8 travel and training for the police officers.

9 Q. And was Waylon Munson your immediate
10 supervisor in October of 2016?

11 A. No.

12 Q. Who was your immediate supervisor at that
13 point?

14 A. That was the thing, they forced me to go
15 to the PATC to work under somebody that I
16 specifically told human resources and everybody that
17 they I would -- they tried to force me back to the
18 London tunnel and I said I would go to work anywhere
19 in the Port Authority except to work for Sandra
20 Ortiz --

21 MR. KROMM: Ms. Talarico, please A, move
22 to strike the nonresponsive portion. I'm
23 asking you a question and I'd just ask that you
24 answer the question directly, A. B, please
25 when you are giving your answer, please try to

1 slowdown so that the reporter can get it.

2 THE WITNESS: I'm sorry, I know I speak
3 fast I'll try my hardest.

4 MR. KROMM: So can you read back my last
5 question please.

6 (Whereupon, the referred-to
7 question was read back by the
8 reporter.)

9 THE WITNESS: That's a gray area, do I
10 answer it fully or technically it was supposed
11 to be Sandra Ortiz but the day I started
12 working there, Claudia Dickey, the director of
13 the department told me I didn't even have to so
14 much as to say hello or goodbye to Sandra
15 Ortiz. So instead she had me answer to someone
16 named Laura Glynn.

17 Q. And then at some point in time you stopped
18 reporting to Laura Glynn, or in other words, Laura
19 Glynn was no longer your immediate supervisor at
20 some point in time?

21 A. Right, then I had Waylon Munson.

22 Q. That's what I'm trying to get at. So
23 basically you have had two direct immediate
24 supervisors in your time at the CSO's office, Laura
25 Glynn and Waylon Munson?

1 A. But Waylon was always the one, I just
2 didn't go direct to him so it's a whole gray area
3 the way it works.

4 Q. And you mentioned responsibilities when
5 you first got there doing petty cash and then travel
6 and training for the police officers, did there come
7 a time when you received other job responsibilities
8 at the CSO's office?

9 A. Yeah, they took away the petty cash and
10 had me do traveling and training for the entire CSO.
11 Which means civilian and non-civilian world trade
12 center people you know, wherever you are.

13 Q. Any other responsibilities that you had at
14 the CSO's office other than that?

15 A. Not that I've been given, but there's many
16 other things that I do when I'm there just because I
17 do them.

18 Q. Now I want to direct your attention to
19 August 4th of 2016. Okay, and were you working on
20 that date?

21 A. After they put me out on June 23rd, I
22 think it's June 23rd they put me out of work and I
23 think that was the date. August 4th was supposed to
24 be my first day back at work.

25 Q. I just want to unpack this a little bit.

1 So August 4, 2016 was your first day back to work
2 since June of 2016?

3 A. Yes, they forced me out, yes.

4 Q. I just want to take this one step at a
5 time. So when you say they forced you out, was that
6 in June of 2016 that you're referring to?

7 A. Yes.

8 Q. And when you say they forced you out in
9 June of 2016, what are you referring to?

10 A. They forced me out.

11 Q. Who is they?

12 A. Jerry Lindenmeir, L-I-N-D-E-N-M-E-I-E-R,
13 something like that. They forced -- well, you want
14 the sorry of what happened because it's more than a
15 yes or no?

16 Q. Well, we're going to take it one step at a
17 time, let's just start with who is they?

18 A. Well, they is Jerry Lindenmeier, Diannae
19 Ehler, Rebecca Krulenburg [sic] I believe was
20 involved. I think what's his face that works here
21 was involved, and the people -- Dr. Fisher was
22 involved, Robin Martin was involved and the
23 contracted psychologist in New York, what the heck
24 is his name, Novich [sic] there was a group of
25 people that were involved that they decided to have

1 all these phone calls and forced me out.

2 Q. And when you say forced you out, what do
3 you mean?

4 A. They put me out my entire Port Authority
5 -- let me rephrase, my entire Port Authority career
6 I had perfect attendance. I was never out sick once
7 or anything, they forced me out by putting me out
8 sick and telling me I needed to go see a
9 psychiatrist before I was allowed back.

10 Q. And that was in June of 2016?

11 A. Yes.

12 Q. And did they tell you -- withdrawn -- did
13 anyone tell you why they were asking you to see a
14 psychiatrist?

15 A. Absolutely not, but I was not allowed to
16 return to work until I did.

17 Q. And did you in fact see a psychiatrist?

18 A. Absolutely.

19 Q. And who did you see?

20 A. I don't remember her name, I do have the
21 records home, and I'm sure you have them too. Port
22 Authority has them because she sent a letter about
23 the results of my examination.

24 Q. And was this one psychiatrist or did you
25 see multiple psychiatrist?

1 A. No, this was one psychiatrist that the
2 Port Authority made me go to a psychiatrist to
3 before I was allowed to go back to work then she had
4 to give them a report.

5 Q. And you don't remember the name of this
6 psychiatrist?

7 A. I saw her once, I could tell you the bill
8 was like 350 dollars that I had to beg the Port
9 Authority to reimburse me.

10 Q. Ms. Talarico, please, I'd just ask that
11 you answer the question --

12 A. Okay.

13 Q. Were you seeing your own psychiatrist or
14 therapist?

15 A. No -- therapist, yes.

16 Q. Please, again, let me finish the question?

17 A. I got it.

18 Q. And what is the name of the therapist that
19 were you seeing at that time?

20 A. Gary Depice, D-E-P-I-C-E. And that was
21 sporadic that was not a constant see the therapist,
22 it was predicated upon what was going on in my life.

23 Q. Or did you see Mr. Depice at all in
24 between June of 2016 and August 4, 2016?

25 A. Absolutely.

1 Q. Was this the first time -- withdrawn -- in
2 June of 2016 when you were asked to go to PA medical
3 to see a psychiatrist, was this the first time that
4 you had been ask to see a psychiatrist?

5 A. Oh, no it was the second -- wait, back up,
6 no, that's an incorrect answer. I take that back.
7 No, it was the second time that Port Authority sent
8 me to PA medical, not to a psychiatrist. The June
9 was the first time I ever went to a psychiatrist but
10 it was the second time they sent me to PA -- no, it
11 was the third -- well, I don't even know, whether it
12 was the third or fourth time they sent me to medical
13 PA, I'm not sure.

14 Q. So to the best of your recollection, in
15 July of 2016 that was either the third or fourth
16 time that you were sent to PA?

17 A. No, no, no, I missed -- when Steven
18 Palatano [sic] was alive he forced me to go see Dr.
19 Francis who is a Port Authority therapist, okay once
20 --

21 Q. Yes, I don't want to cut you off you're
22 going to be permitted to finish --

23 A. I'm trying to figure out when I went
24 there.

25 Q. Was that the first time?

1 A. That was the first time, that was when
2 Steven Palatano was alive which was years before.

3 Q. And approximately what time was that?

4 A. I have no idea, Steven Palatano was still
5 alive so it was when I was at the Lincoln, I was
6 trying to get somebody to help me and I wouldn't
7 give up and I went through the whole chain of
8 command and wrote a letter to Floyd -- sorry, I
9 wrote a letter to executive director Floyd after
10 everyone in TBT was ignoring me begging me for help
11 so the next thing you know, they send me to medical.

12 Q. When you say and I'm only referring to
13 this first time, when you say that TBT was ignoring
14 you, can you elaborate what do you mean by that?

15 A. They were allowing me to be abused and
16 harassed and intimidated and be treated like dirt
17 and they never tried to stop it.

18 Q. Who is they?

19 A. Who is they, who allowed it, I went
20 through the whole chain of command, you name it I
21 went to them. All the way up to Cedric Fulton and
22 Steven Palatano because prior to Cedric Fulton,
23 Steven Palatano was the head there.

24 Q. Can you recall, I know you said you went
25 through all of them?

1 A. Oh, my God, I went to HR, I went
2 everywhere you name a person in the Port Authority
3 and upper management that a person would go to, and
4 I went to them. Stephanie Desiree, Rebecca
5 Krulenburg, Mary-Lee Hanna, Patrick Floyd, Cedric
6 Fulton, Steven Palatano, Diannae Ehler of course,
7 Mark Chaffey, [sic] he was the only one that was
8 halfway decent and ever tried to help me, who else?

9 Q. Ms. Talarico, these names that you're
10 naming, this was all that first time?

11 A. Oh, see I don't -- can I tell you honestly
12 --

13 Q. Ms. Talarico, please just answer --

14 A. I don't know the answer to that.

15 Q. If you don't know that's fine?

16 A. Okay, I don't know the answer, these are
17 the names of people that I begged to for help over
18 the course. The very first time it would have to be
19 with Steven Palatano and I want to say Mary-Lee
20 Hanna for sure, I can't tell you who else then. But
21 I went -- I wouldn't have a job if I didn't go to
22 chain of command so whoever I should have gone to
23 for assistance, my direct supervisor at the time
24 Ann-Marie Gentil [sic] I forgot about her. I think
25 Pearson Smalls [sic] I went to at the time. There's

1 so many people I begged for help, I really can't
2 tell you which group and remember a lot of these
3 people I kept going back to for help because I
4 wasn't getting any.

5 Q. And you don't recall when that first time
6 was?

7 A. It was after -- well, it was the end -- I
8 sent my letter to Patrick Floyd I want to say it was
9 at the end of the year so maybe 2012, maybe 2012 I
10 sent a letter to Patrick Floyd.

11 Q. And when were you first employed by the
12 Port Authority?

13 A. January 5, 2009.

14 Q. So it was approximately three years after
15 you first came to the Port Authority that this --

16 A. The Lincoln Tunnel was the problem, I
17 worked in Staten Island prior to the Lincoln Tunnel
18 so all this real real bad bad stuff happened at the
19 Lincoln Tunnel.

20 Q. So in January of 2009, where was the first
21 facility that you were assigned to?

22 A. Staten Island bridge.

23 Q. And when did you leave the Staten Island
24 bridge?

25 A. Then I took a lateral position temporary

1 -- let me get it in the right order, to the chief
2 security office which at the time was called public
3 safety then that was temporary, I was only there for
4 a few months because the person came back to work.
5 Then I had to go back to Staten Island, should I
6 keep going?

7 Q. Please?

8 A. Then I went from Staten Island to another
9 temporary at the George Washington bridge. I'm not
10 sure if I have them in the right order, it could
11 have been PATC first then the head quarters, no, I
12 think -- then the George and then I went back to
13 Staten Island, I'm pretty sure, this is the best I
14 can remember, you know I've been through a lot.

15 Q. I'm only asking for your best
16 recollection?

17 A. And then I went and took a lateral
18 position to the Lincoln Tunnel which was a permanent
19 position.

20 Q. Approximately when was that lateral switch
21 that you took to the Lincoln Tunnel?

22 A. Oh, I just had that date, I want to say it
23 was like in November.

24 MR. SOTO: Do you want her to leave that
25 blank for her to fill that in?

1 MR. KROMM: We can do that.

2

3

4 A. It's about 2011, I want to say my father
5 died in -- I started in 2009 and my father died 2010
6 and I was at the Staten Island so it had to be 2011,
7 or maybe '12 but I'm leaning towards '11, but it was
8 late in the year, it was like November, December if
9 I can pull-up my Port Authority calendar I can
10 probably tell you.

11 Q. As your Counsel mentioned we'll leave it
12 blank and then --

13 A. I'm sure you have the records.

14 Q. All what I have in front of me is -- I do
15 not have when you started at the Lincoln Tunnel. So
16 and then is it and am I correct in saying that the
17 problems that you were alluding to where they first
18 sent you to OMS occurred after you got to the
19 Lincoln Tunnel in approximately 2011 or 2012?

20 A. I don't understand the question.

21 Q. You had no problems at the Staten Island
22 bridges, correct?

23 A. I wouldn't call it -- I mean nobody has
24 perfect days at work you know but it was okay there.
25 There was definite cliques and stuff you know where

1 everybody didn't love you that definitely happens in
2 the Port Authority unfortunately. But as far as
3 having any of these big issues, anonymous notes,
4 people spiting in my food, and all that no, it all
5 happened at the Lincoln.

6 Q. And so you were telling us about the first
7 time that the Port had sent you to OMS and that was
8 based on things that were going on between you and
9 other individuals at the Lincoln Tunnel?

10 A. Actually, I don't know that I agree with
11 that analysis of what had happened.

12 Q. So please tell me?

13 A. Well, steven Palatano was not happy that I
14 sent a letter to Patrick Floyd, so Steven Palatano
15 had myself and Donna Leborn in a room, in a meeting
16 Steven Palatano proceeded to pull his chair within a
17 millimeter of my nose and point his finger at my
18 face and told me if I don't go along with his
19 program he's calling HR and I'm out of here, which
20 to me is threatening my job. And then Donna Leborn
21 [sic] took notes of the meeting okay, I asked for a
22 copy of the notes and she said oh, I threw them out
23 and I said well send me a copy of the notes you sent
24 to Steven Patalano, oh, I deleted it. The note the
25 minutes from that meeting that Steven Palatano wrote

1 or had written, do not reflect anything that
2 occurred during that meeting and when I asked Donna
3 Leborn about Steve getting in my face and scaring me
4 okay, how about she says, I don't recall. So,
5 that's why I went because I went and wrote another
6 letter saying what he did to me and that's why they
7 sent me to medical. That had nothing to do with how
8 I was getting along, they didn't care. I always did
9 my work, my work was impeccable, impeccable, I saved
10 the Port Authority thousands and thousands of
11 dollars of needless overtime. I did my job exactly
12 the way I was told to do it, I never missed any of
13 my work, no one else ever did any of my work but the
14 problem was, the people that was losing the overtime
15 from sitting around weren't happy. The TBA's they
16 started harassing me to an extent that should been
17 allowed. The girls in the office was mad because
18 they took work away from them and gave it to me,
19 which makes no sense to me but that's what they do.

20 Q. So the first time that you were sent to PA
21 medical --

22 A. I was sent to Journal Square to see Dr.
23 Francis and Dr. Francis opens up her notes and says
24 Charlene, you don't even have a file in medical. I
25 know Dr. Francis, I've never been here. Charlene

1 why are you here, well, because they're forcing me
2 here because I keep begging for them to get me some
3 help and have people stop abusing me and so they
4 decided to send me here.

5 Q. And was that -- how many times did you see
6 Dr. Francis --

7 A. Once.

8 Q. Please let me finish -- so that you had
9 one trip to PA medical that first time and one
10 meeting with Dr. Francis and --

11 A. At Journal Square.

12 Q. At Journal Square, and then did you return
13 back to work after that?

14 A. Absolutely, I wasn't even out of work,
15 they just made me an appointment to go there, I was
16 working that whole time.

17 Q. And did there come a point in time when
18 somebody at the agency referred you back to PA
19 medical for a second time?

20 A. Yeah, years later when Jerry Lindenmeier
21 came to the Lincoln Tunnel to make my life a
22 living -- oh, no -- yes, because that was after
23 Steve to make my life a living hell, yes. Jerry
24 sent me, I don't know if he sent me there two or
25 three times, I'm not quite sure but it all revolved

1 around me trying to get help and refusing to stop
2 writing emails and begging for help. I went up the
3 entire chain of command begging for help, I even
4 went to Newark.

5 Q. Ms. Talarico we'll get there. So and now
6 we need to go back, lay this out a little bit. So
7 the second time you were sent to PA medical you said
8 that it was Jerry Lindenmeier that referred you
9 there, is that correct, yes or no?

10 A. Jerry Lindenmeier is the one who said it
11 but there was other people who were involved in it.
12 I'm sure Rebecca Krulenburg and Diannae Ehler and
13 what's his name, I can't remember because I know
14 when the lawsuit -- when I put the lawsuit in charge
15 Diannae Elher with the criminal offenses, I got
16 notes and stuff that said people were involved --

17 Q. Ms. Talarico, please, please, we're going
18 to take it --

19 A. I'm just trying -- I don't know exactly --
20 Jerry Lindenmeier is the one who told me I had to go
21 and had me escorted and driven to medical but this
22 time he sent me to New York.

23 Q. This is the second time that we're talking
24 about?

25 A. First time from Jerry but second time to a

1 different because this is a different medical
2 office.

3 Q. OMS on Park Avenue?

4 A. Yes.

5 Q. Approximately how long after the first
6 time that you were sent?

7 A. No, idea.

8 Q. And when you were sent the second time to
9 PA medical, who did you see to there?

10 A. That contract person, there's a contract
11 therapist Novich, I think his first name is Jeremy.

12 Q. And how many times did you speak with
13 Novich?

14 A. That time I went back to work.

15 Q. So you went to PA medical on the second
16 time to the office on Park Avenue South, you spoke
17 with Novich and Novich sent you back to work, is
18 that correct?

19 A. Yes.

20 Q. And then was there a third time that you
21 were sent to PA medical, yes or no?

22 A. Yes, maybe, there's a third there might be
23 a fourth, I'm not sure if there was three or four,
24 I'm not sure. He definitely sent me to the one and
25 had me escorted, I'm not sure if he sent me again or

1 well -- he sent me, but I was going anyway. So I'm
2 not sure if there was one in between the day I got
3 assaulted or not, I can't remember honestly.

4 Q. So let me take a step back --

5 A. It came to me, so he sent me to Novich the
6 first time, Novich had me go back. The second time
7 I went to Novich, that's when he told me -- they put
8 me out and told me I have to go see a psychiatrist
9 that was the second time. But there is a third
10 time.

11 Q. And that second time was June of 2016?

12 A. I believe.

13 Q. And when you say second time, you mean
14 second time from Jerry Lindenmeier which would then
15 actually be the third time total, correct?

16 A. Absolutely, and Jerry Lindenmeier was in a
17 short period of time.

18 Q. And that second time which occurred in
19 June of 2016, the first day back from that leave was
20 August 4th of 2016, is that correct?

21 A. Yes.

22 Q. And did somebody notify you or tell you to
23 come back to work on August 4, 2016?

24 A. On August 3, 2016 first of all, I don't
25 know where this goes in but I was made aware that I

1 was supposed to go back to work on August 4, 2016
2 because I was very concerned and said I don't want
3 one day without pay. So August 4, 2016, I was
4 supposed to go back to work. August 3, 2016, I met
5 with that contract guy Novich, that guy up on Park
6 Avenue who while I was out and I do have documented
7 anxiety, they rearranged my cubicle which would have
8 exacerbated my anxiety, going against Americans with
9 Disabilities, I spoke with Dr. Novich --

10 Q. Ms. Talarico, will have an opportunity --

11 A. This has to do with going back to work.

12 Q. I know, but you didn't realize that
13 anybody changed your cubicle --

14 A. Oh, yeah, I knew months before, and I was
15 writing to HR all the time, how can you do this,
16 absolutely. So, I go to Dr. Novich -- I didn't go
17 because I wanna, I have to and there were times that
18 I had to visit help him in between while I was home,
19 you know to check in for no apparent reason. On
20 August 3rd I was with him and he said he talked to
21 my personal therapist that is Depice and that Gary
22 told him that the workspace was fine. Well, I
23 called up Gary from Doctor -- well, I don't call him
24 a Doctor, Novich's office, I called up Gary and
25 Gary said he never said any such thing and I told

1 Dr. Novich that I can't work in that space, it's not
2 right, it doesn't work and Dr. Novich says just go
3 and deal with management when you get there.

4 Q. All right lets try to focus on this one
5 issue the cubicle. What happened to the cubicle
6 that you feel was done improper?

7 A. They rearranged it so my anxiety would be
8 off the charts, they had it so every person walking
9 through the door would be banging pass me and then
10 they had me trapped where I wouldn't be able to feel
11 like protected. I need to have my back to things
12 like when I work in PATC, there's an opening over
13 here where everybody can see, the doorway is here,
14 my back is here, my desk is here. When I first got
15 to PATC before they moved me to this different
16 location, there was a opening here and I was way in
17 the corner so nobody could be able to come up behind
18 me and freak me out.

19 Q. At the Lincoln Tunnel, the cubicle that
20 you were working in before you were sent to medical
21 in June of 2016 --

22 A. How was it arranged?

23 Q. You're right, that was going to be my
24 question but please wait until I finish it, how was
25 that cubicle arranged?

1 A. You have to understand -- here's the
2 doorway okay, this is the doorway into the office,
3 right, this is the opening to get into the office
4 where everybody is. Now, my cube is right here, at
5 the entrance of the doorway okay, so well, the
6 entrance is here there's a walkway. My cube opened
7 here there was a wall so anybody that walked through
8 the door was walking pass the wall, not me opening
9 right at the doorway. So then, they took the --
10 because you know where the closed part is was over
11 here and I had an opening here and this open so I
12 can feel open and nobody can come around behind me,
13 and it was open and I could see what was going.
14 Instead, they rearranged it so that I was trapped
15 with this big thing in front of me and this whole
16 side was open so that every time somebody came by, I
17 couldn't pay attention to what I was doing.

18 MR. KROMM: Were you able to get all of
19 that in the shot?

20 MR KAUFMAN: Do you want her to draw a
21 diagram?

22 THE WITNESS: You have pictures, there's
23 pictures in the file. Jerry Lindenmeier sent
24 in the files there's all kind of pictures of
25 what it was like afterwards and everything, I

1 can draw what it was like before. But what
2 they did was they put the big cabinet with the
3 file in it over my head so that I would be I'm
4 supposed to be here, people can come up behind
5 me here and then I've got this big thing over
6 here.

7 Q. And did you become aware of the change in
8 the cubicle while were you out?

9 A. Yes, I wrote emails requesting that they
10 fix it that it wasn't going to work that it would
11 exacerbate my anxiety prior to me going back to
12 work.

13 Q. There came a point when they asked to come
14 back to working, correct?

15 A. They told me I had to come back to work
16 and I told you Novich said deal with management
17 after he talked to my therapist that day who
18 confirmed that it was no good.

19 Q. Did they call you and tell you, or did you
20 receive a letter?

21 A. I have no idea, I want to say -- that time
22 I don't know if Novich told me, I don't know who
23 told me, I have no recollection of who told me,
24 somebody did obviously.

25 Q. But I believe you had mentioned earlier

1 that they told you on October -- I'm sorry, on
2 August third the day before?

3 A. I might have known before. All I can tell
4 you is that on August third I went to see Novich. I
5 might have already known I had to go back on the
6 fourth, but I had to see him on the third because he
7 would have to clear me to go back work on the
8 fourth. So I have no idea how I found out prior to,
9 I'd be lying maybe Rebecca called me, I don't know.

10 Q. You don't know, you don't know, that's
11 fine. But you do know that you went back to work on
12 August 4, 2016, correct?

13 A. Yes.

14 Q. And what time did you go back to work that
15 day?

16 A. Approximately I was normally working at
17 7:30, I normally get to work earlier so somewhere in
18 between seven and 7:30 I would guesstimate.

19 Q. And what happened when you arrived?

20 A. Oh, Jerry Lindenmeier and Diannae Ehler
21 are waiting for me which never happens. Jerry
22 Lindenmeier usually didn't show up to work until
23 late and Diannae Ehler was never there in the
24 morning when I got there.

25 Q. And where were they waiting?

1 A. In Jerry's office.

2 Q. And where was Jerry's office in relation
3 to your cubicle?

4 A. It was over there.

5 Q. Approximately how far away, approximately?

6 A. Well, the entrance to his door was
7 maybe -- I don't know, maybe five feet from my
8 cubicle the entrance to his office.

9 Q. And when you arrived, did you go to your
10 cubicle?

11 A. I think they called me in and I had all of
12 my stuff in my hands I think, I'm not sure. Because
13 I couldn't sit in the cubicle, I did not go to sit
14 in the cubicle because I couldn't, I knew it didn't
15 work for me.

16 Q. So you're not sure if you went to your
17 cubicle first or Jerry Lindenmeier's office first,
18 is that correct?

19 A. I think they called me in and said that
20 they wanted me to put my stuff -- I think, this is
21 all thinking, that they wanted me to put my stuff
22 down and have a meeting.

23 Q. Okay. Who said that to you Jerry or
24 Diannae?

25 A. I don't know, one or both of them.

1 Q. And did you in fact go but your stuff down
2 and go back for the meeting?

3 A. Yeah, I went back in and I told -- well,
4 yes.

5 Q. And what stuff did you have that you
6 putdown?

7 A. My bag with my lunch, my pocketbook, my
8 stuff.

9 Q. What happened when you went back into the
10 office?

11 A. I told them that I would not meet with
12 them unless I had a representative someone on my
13 side because of what happened.

14 Q. And what did they say in response to that?

15 A. Oh, they sent me out of the room. They
16 said you can't do that and then a while later, they
17 made a bunch of phone calls and then they talked
18 to -- I don't even know, what's his name -- oh, I
19 can't think of his name and Rebecca and them and
20 then they come back and say we can meet with you
21 with a representative but has to either be someone
22 from your union or management. And you have to have
23 them here by Ten A.M. and what's the chances of
24 that.

25 Q. U7n

1 and did you call somebody?

2 A. I called lots of people, everybody I can
3 think of and nobody was available and finally
4 because Mark Chaffey unfortunately got transferred
5 to the bus terminal and left the Lincoln that's when
6 my life got even worse when Jerry came. I called
7 Mark I didn't know what else to do so I called Mark
8 and that was tide up in a tour and he wasn't going
9 to be able to be exactly at Ten o'clock but he said
10 that he would come he would just be a few minutes
11 late. Which I told Rebecca Krulenburg and Rebecca
12 told me that she was going to tell Jerry and
13 Diannae.

14 Q. When you spoke to Mark, were you speaking
15 to him on the office phone in your cubicle --

16 A. No, my cellphone.

17 Q. Please let me finish. You called Mark on
18 your cellphone?

19 A. I believe, I believe I called everybody
20 from my cellphone -- except maybe Rebecca
21 Krulenburg, I might have called from the office
22 phone, I'm not quite sure, it's a long time ago.

23 Q. Did you have your cellphone with you when
24 you first went into Jerry's office that morning?

25 A. I believe I did, I always have my

1 cellphone with me if I didn't, I would have gone
2 back to get it because I don't go any where without
3 it.

4 Q. Did there come a point that morning where
5 you told Jerry and Diannae that you wanted to go get
6 your phone from your cubicle?

7 A. I don't know, if I didn't have it with me,
8 I would have gone to get it, and if I had it with
9 me, I wouldn't have, I honestly don't recall.

10 Q. Other than Mark, Mark Chaffey, who else
11 did you call that morning -- please let me finish.
12 Who else did you call that morning to come down to
13 be in this meeting?

14 A. Everyone I could think of and anyone I
15 could think of. I couldn't even -- numerous people
16 I can't even tell you who. I knew my union was no
17 good they was never going to get there for Ten
18 o'clock you can't get them to answer the phone. I
19 don't even know. I called some cops that I knew, I
20 called some friends that I knew, I called everybody
21 I could think of but I can't tell you who because I
22 don't recall.

23 Q. And after you spoke with Mark and he said
24 that he could not get down there until approximately
25 Ten o'clock, did you relay this information back to

1 Jerry and Diannae?

2 A. I told Rebecca Krulenburg who told me that
3 she was going to tell Jerry and Diannae.

4 Q. What happened next after she told you
5 that?

6 A. I don't know what happened next, all I
7 know is at some point Jerry and Diannae started
8 giving me grief that Mark wasn't coming, does Mark
9 knows he's coming I said Rebecca said she was going
10 to call you so with them standing there screaming at
11 me. I called Rebecca again and Rebecca -- I don't
12 even know exactly but then Rebecca called Jerry in
13 his office and the next thing you know, they come
14 back out, I don't know it just got really crazy and
15 they were yelling at me it was insane.

16 Q. When you say that Jerry and Diannae were
17 yelling at you, where in the office was this
18 occurring?

19 A. Right in front of Jerry's office in front
20 of my cubicle.

21 Q. This was in between your cubicle and
22 Jerry's office door in that area?

23 A. No, the cubicle is here, there's a path --
24 here this is my cube okay, this is my cube. Here's
25 the door you come in and here you go here and

1 Jerry's office is here, at the end of my cube and
2 Zonabia's [sic] office is over here, we were over
3 here.

4 Q. It is more right in front of your cubicle
5 then?

6 A. Yes, in the pathway towards you know.

7 Q. In the pathway towards Jerry's office?

8 A. Jerry's office, that's the best of my
9 recollection.

10 Q. And while were you in that area that you
11 just described, was anybody else there other than
12 you, Gary -- I'm sorry, you, Jerry and Diannae?

13 A. I'm sure there was people walking by
14 people, I would assume people were doing their
15 normal business and they were yelling at me so I
16 everybody wants to see what's going on. I have no
17 idea who, but I'm sure there must have been.

18 Q. Did there come a point in time when you
19 went back into Jerry's office?

20 A. Because it was getting so loud and they
21 were screaming at me, Diannae said, that's it, lets
22 go in Jerry's office and I turn around and she
23 pushes me and I said, you're not allowed to touch
24 me, you don't push me.

25 Q. What happened next?

1 A. Then we go into Jerry's office and I'm
2 very nervous and very upset and so when you walk
3 into Jerry's office, as soon as you get into office
4 to the left, there's a chair with a table. I
5 immediately sat down in that chair because I didn't
6 know what else to do because I was so upset they
7 were screaming at me. And then Diannae was in front
8 of me on one leg, Jerry was over here and I was
9 sitting in the chair and I had my phone over here
10 and I put it on the table and they just continued to
11 keep screaming at me.

12 Q. Do you recall what it was that they were
13 screaming?

14 A. They were screaming at me, you better not
15 be taping this, I only wish I was. I wish to God I
16 was taped them because we wouldn't even be here,
17 this would have been done years ago. Screaming at
18 me, you better not be taping this, you better not be
19 taping this.

20 Q. And what happened next?

21 A. Diannae Ehler from over here reaches all
22 the way across goes to rip the phone out of my hand
23 my hand goes up in the air and I was just like kind
24 of in shock and I get up and I said that's it, you
25 assaulted me I'm going downstairs and I went

1 downstairs to the police.

2 Q. And did either Jerry or Diannae say
3 anything when you told them you were going
4 downstairs to the police?

5 A. Not that I recall.

6 Q. Did they attempt to stop you at all from
7 going?

8 A. No that I -- in that instant, no.

9 Q. And where downstairs did you go?

10 A. I went downstairs you go out the office
11 there were stairs right there. I went downstairs
12 walked into the captains office who I did not know
13 because it was a new captain since I was out, it was
14 Captain Gonzalez, Emilio Gonzalez [sic] and so he
15 was sitting there, he didn't know who I was, I
16 didn't know who he was, and I told him I was just
17 assaulted and I want to press criminal charges.

18 Q. And what the captain say?

19 A. He sent me to Sergeant Flemming and then
20 Sergeant Flemming I thought I was put in criminal
21 charges but that's not what happened. And then
22 Jerry Lindenmeier shows up and then all of these
23 other cops show up and everybody is yelling at me
24 and then the captain comes back and it's not his
25 decision and he says, I'm sorry, Ms. Talarico this

1 this doesn't rise to a criminal level, we won't be
2 accepting any charges. I looked over and I pointed
3 right at him and said captain, if you don't accept
4 these charges, I'm going to Weehawken and if
5 Weehawken doesn't accept them, I'm going to the
6 state police.

7 Q. And what did he say in response?

8 A. Then they all Sergeant Kellerhar, [sic]
9 Lieutenant De Martino [sic] was there, they were all
10 telling me, you don't go to the police, you don't go
11 to the police -- no, yeah, you don't go the police,
12 you go to the court, you go to the court. Yeah,
13 sure I was a deputy court administrator, you go to
14 the police, I know where you go. So anyway, then
15 they had my writing down this statement with
16 Flemming which I thought was putting in a police
17 report, turns out it was only an incident report.
18 They had some female cop come sit over here who I
19 never said three words to or spoke, Harrington [sic]
20 was her name and she just sat there and I kept
21 making mistakes on this because I was shaken and
22 nervous and everything and I kept ripping them up
23 and starting again. And then there like Jerry comes
24 down and they're all hanging in the doorway and
25 staring at me talking about me, they're like have

1 you to come up stairs for this meeting, you have to
2 come up stairs for this meeting. So Flemming says
3 Charlene it's okay, you go upstairs for the meeting
4 and then you come back downstairs and we'll do this
5 then. I go upstairs and basically they give me this
6 piece of paper that says all kinds of things, they
7 changed all my work responsibilities, I'm not
8 allowed to email, I'm not allowed to talk to
9 people, I mean it was bizarre what they wrote and to
10 me it was more retaliation and abuse. So they had
11 me so upset at one point that I was ready to throw
12 up, then I ran out of the room and went the ladies
13 room and threw up. And then I come back in and
14 Michelle Corosis [sic] stops me and says come in,
15 come in my office, I said I can't, I said I don't
16 know what the heck they're doing in there and I was
17 so upset. So I went back in and I said are you
18 done, and they said they were done. I went
19 downstairs to the police to Sergeant Flemming and I
20 started writing again and as I was sitting there
21 writing, my hands started tingling and started
22 swelling up over here and I said to Flemming, look,
23 I don't know what is going on so I called PA medical
24 --

25 Q. Just so we're clear, it's your left hand

1 you're referring to?

2 A. Yeah. I showed Flemming he sees it and
3 everything so I called PA medical, I called PATC PA
4 medical where Madonna and them are but they were out
5 to lunch because I decided I needed to have somebody
6 look at this in PA medical so --

7 Q. Lets slowdown, I'll give you a chance to
8 keep going. So you called PA medical on the New
9 Jersey side?

10 A. Journal Square -- not Journal Square,
11 PATC.

12 Q. And there was nobody there?

13 A. Nobody answered, I left a voicemail.

14 Q. And then after that, did you call PA
15 medical on the New York side?

16 A. Oh, no.

17 Q. What happened next?

18 A. I go upstairs to tell Jerry I'm going to
19 PA medical and he ordered me to PA medical to go see
20 that contract guy, Novich again but I was already
21 going on my own account to have my hand looked at in
22 PATC.

23 Q. Right but --

24 A. I didn't make my plan to go to Park
25 Avenue, no, that was them forcing me again. And now

1 he sends me with two guys that sends me in a van
2 with two guys that worked in the maintenance
3 electrical whatever guys.

4 Q. So let me just ask, when you went back and
5 Jerry ordered you to PA medical that's PA medical on
6 Park Avenue South, correct, because he wanted you to
7 speak to Novich, correct?

8 A. Well, he didn't tell me why, he just
9 orders me.

10 Q. But at that time point in time you had not
11 called PA medical on Park Avenue South?

12 A. Never, I had no intentions of going there,
13 I was going to PATC.

14 Q. Just a reminder let me finish before you
15 start answering. So you went to PA medical on Park
16 Avenue South with these two other individuals they
17 drove you over, is that correct?

18 A. Oh, yeah.

19 Q. And this was based on Jerry's order to go
20 to PA medical, is that correct?

21 A. Yes.

22 Q. When you got to PA medical on Park Avenue
23 South, approximately how long did it take you to get
24 there?

25 A. I don't know, I have no idea, I mean we

1 weren't stuck in traffic if that's the question, I
2 have no idea how long it takes.

3 Q. When you got there to Park Avenue South,
4 what did you do?

5 A. I went upstairs.

6 Q. And did the other two --

7 A. No, they stayed in the van.

8 Q. And when you went upstairs, can you
9 describe for me the layout of that building and OMS
10 in that building, so it's a building it's on Park
11 Avenue South or it was, approximately how many
12 stories in that building?

13 A. How would I know, I have no idea.

14 Q. Were there other offices in that building
15 other than --

16 A. I have no idea what was in the building I
17 assume there would be because it was more than one
18 floor. I have no idea, I walked into the building
19 there was a reception desk, I don't recall if
20 anybody was even at the desk. There's an elevator,
21 I got on the elevator, I went up to the floor I
22 needed to be on, the doors opened into the reception
23 area where you sit and wait for them to call you.

24 Q. And did you check -- when you went
25 upstairs into the reception area in OMS, did you

1 check in at all and speak to somebody at the desk up
2 there?

3 A. If there was somebody at the desk up there
4 I would have spoken to them. Do I recall if there
5 was somebody there that day, sometimes there is,
6 sometimes there isn't. If there isn't somebody
7 there, you just sit there until somebody comes for
8 you.

9 Q. Do you remember if there was anybody else
10 there?

11 A. I have no idea.

12 Q. Do you remember --

13 A. It's all on video though.

14 Q. Ms. Talarico, please let me finish the
15 question. Do you remember if -- withdrawn -- do you
16 know approximately how long it was before somebody
17 asked you to come into the medical office?

18 A. No idea.

19 Q. Now, this the reception area approximately
20 how big was it, were there seats in there?

21 A. Oh yeah, it's big, I think it's wider than
22 this room. I want to say two elevators open up,
23 there's glass doors over here, there's glass doors
24 over there, there's a reception desk over there and
25 there's chairs all in the middle and there's a

1 couple of chairs along the wall here too.

2 Q. So is it fair to say at some point in time
3 somebody came and asked you to come into the medical
4 office off of the waiting area?

5 A. Yeah, they came and got me out of the
6 reception area and took me into the medical office,
7 yes.

8 Q. Can you describe the medical office for
9 us?

10 A. It's a medical office, it had medical
11 equipment, it had the curtains, it had the tools,
12 you know things for the ceiling, there were
13 cabinets, there was gurney you sit on or whatever
14 you call it.

15 Q. Were there examination tables in this
16 area?

17 A. Isn't that what like the gurney thing is,
18 to me that's -- yeah, I'll say yes, to me that's
19 what it was, I don't know if you call it a table or
20 a gurney or whatever.

21 Q. Did you --

22 A. There were curtains you could close for
23 privacy.

24 Q. Do you remember how many gurney's or
25 tables there are in that area?

1 A. No, I don't remember.

2 Q. Were there more than one?

3 A. I have no idea.

4 Q. But you do at least remember seeing one
5 with a curtain around it, correct?

6 A. Well, the curtain wasn't around it, the
7 was right here. So there was a curtain nothing was
8 closed off, the curtain was there, the curtain was
9 wide open.

10 Q. And who was the first person you saw when
11 you went into that area outside of the reception
12 area?

13 A. I have no idea.

14 Q. Do you recall meeting with a doctor?

15 A. Yeah, Dr. Kerlegrand.

16 Q. Did you speak with anyone from OMS before
17 you spoke with Dr. Kerlegrand?

18 A. Maybe I'm not sure, if they asked me
19 questions, I don't know.

20 Q. When you met with Dr. Kerlegrand did you
21 -- who spoke first, did you talk to her first --

22 A. I don't know.

23 Q. Please let me finish, did you speak to her
24 first or did she speak to you first?

25 A. I don't recall.

1 Q. What do you recall when speaking to Dr.
2 Kerlegrand?

3 A. Well, I recall she asked what happened, I
4 told her Diannae Ehler assaulted me. I told her how
5 I was assaulted and I told her that my hand was
6 tingling and swelling and showed her my hand.

7 Q. Did Dr. Kerlegrand tell you if she knew
8 that you were coming or not?

9 A. Not that I recall, I don't know. I'm not
10 saying she didn't, I'm not saying she did, is my
11 answer, I have no recollection.

12 Q. Where were you showing your hand to Dr.
13 Kerlegrand in the medical office?

14 A. In the medical office.

15 Q. But where in the medical office?

16 A. In the office, what do you mean where, we
17 were in the office, the doorway was way over there
18 we were in the office.

19 Q. Lets slow it down and sort of go through
20 it step by step. When you first go into the office
21 what is the first thing you see?

22 A. I was there all of once, and I had never
23 been back.

24 Q. Ms. Talarico, if you do not remember, say
25 you don't remember?

1 A. All I know is it's a medical office like
2 you go in a doctors office and it's a medical office
3 that's all I know. What exactly was in there, I
4 think it was like a refrigerator over there, there
5 was the curtains I remember. There was whether it
6 was a table a gurney or bed or whatever was over
7 there. There was a chair over here, I don't know
8 what else was in there.

9 Q. When you entered into the medical office
10 and you were speaking to Dr. Kerlegrand, did anyone
11 ask you to sitdown on either the gurney or a bed or
12 chair there?

13 A. I don't know if they asked to me but I did
14 sitdown, I just don't know if I sat down or they
15 asked me to sitdown.

16 Q. What did you sitdown on?

17 A. A chair.

18 Q. So it wasn't the bed or the gurney?

19 A. No.

20 Q. And where was the chair that you sat on?

21 A. Right there with the curtain and
22 everything.

23 Q. Was the chair right next to the gurney?

24 A. I have no idea, I don't recall and I don't
25 know if it was a gurney or table you call it but it

1 was something that could you have lied down on.

2 Q. And where was Dr. Kerlegrand while were
3 you seated on the chair?

4 A. I guess she was standing in front of me, I
5 don't know.

6 Q. Don't guess, if you don't remember, you
7 don't remember?

8 A. Well, at some point she was there when I
9 was sitting in the chair I just don't know at which
10 point.

11 Q. And what did Dr. Kerlegrand say to you
12 while you were sitting in the chair?

13 A. What happened.

14 Q. And what did you tell her in response?

15 A. I told her exactly how I was assaulted by
16 Diannane Elher trying to rip my cellphone out of my
17 hand and how they were screaming at me and that my
18 fingers -- you know, my hand over here was starting
19 to swell up and I showed her and my fingers were
20 tingling like they were getting numb.

21 Q. And was there a door to this area where
22 you were seated in the chair?

23 A. We were way into the room, it was a long
24 room, we were way back here and the room was over
25 there I honestly don't know, I have no recollection.

1 Q. And so you don't -- was this area that you
2 were seated in a chair separate and apart from the
3 rest of the medical office?

4 A. No, it's right there, here's the curtain
5 right here, I can touch it.

6 Q. So there was no door that you saw?

7 A. I'm not saying that, I don't know, I don't
8 recall.

9 Q. Approximately how long were you seated in
10 the chair talking to Dr. Kerlegrand for?

11 A. I have no idea.

12 Q. A couple of minutes, half-hour?

13 A. I have no idea.

14 Q. An hour?

15 A. I have no -- I doubt it an hour because
16 then she had me get up and she did all of her
17 examination and do this and do that and let me see
18 your hand and do this and do that so, no, because
19 remember I also had to go see that other guy.

20 Q. Novich?

21 A. Yes.

22 Q. Did you see Novich before or after you
23 spoke to Dr. Kerlegrand?

24 A. I want to say after, or maybe in between,
25 I'm not sure. I'm pretty sure I saw Kerlegrand

1 first I just don't know if I saw Kerlegrand again
2 after it, you know what I mean?

3 Q. Where you were with Dr. Kerlegrand seated
4 in that chair, could other people walking by see
5 what was going on?

6 A. Well, the nurses were there you know, Mary
7 Burke or whatever they could see and if somebody was
8 allowed into medical, I don't know, I guess because
9 they didn't have the curtains closed around me so I
10 guess they could see them, I don't know.

11 MR. SOTO: I just want to raise an
12 objection, she obviously answered it.

13 Q. What did Dr. Kerlegrand ask you to do for
14 the examination?

15 A. Oh, she was having me doing things with my
16 hands, with my hands out, touching my nose going --
17 that's the stuff I remember, I couldn't tell you
18 everything because I don't remember all.

19 Q. Did she give any x-rays?

20 A. Yeah, they took x-rays, they took x-rays,
21 yes, and they took x-rays.

22 Q. And where did those x-rays -- where were
23 they taken?

24 A. There, wherever they take them, they took
25 me somewhere.

1 Q. But that's in a different area than --

2 A. In different room, yeah.

3 Q. And approximately how long -- withdrawn --
4 did they take you for x-rays after Dr. Kerlegrand
5 was performing the examination on you?

6 A. Yes, I'm pretty sure, I'm pretty sure.

7 Q. And after Kerlegrand looked at your hand
8 and asked you to move your hand around, that's when
9 they took you for x-rays?

10 A. I don't recall whether when I saw Novich
11 when I got the x-rays, I know they took x-rays, I
12 know I saw Novich, I know I saw Dr. Kerlegrand, I
13 know they bandaged my hand, I don't know.

14 Q. After Dr. Kerlegrand looked at your hand,
15 was she the one who took you to x-ray machine?

16 A. I don't know.

17 Q. How far away from that area by the seat
18 that you were telling us about is the x-ray machine?

19 A. I don't know.

20 Q. But it is presumably in another room,
21 correct?

22 A. I believe it's in another room, I'm pretty
23 sure it's in another room.

24 Q. Do you remember how to get to the --

25 A. Absolutely not, it's like a maze in there.

1 Q. And was Mary Burke there when Dr.

2 Kerlegrand was looking at your hand?

3 A. She was in and out.

4 Q. Do you recall what Dr. Kerlegrand said to
5 you if anything when she was looking at your hand?

6 A. I don't recall.

7 Q. Did Dr. Kerlegrand or Mary Burke tell you
8 that they were going to give you x-rays?

9 A. I don't know who said I was getting an
10 x-ray, they took me to x-ray, I did what they told
11 me.

12 Q. And after they took the x-rays, did you
13 stay in that -- withdrawn -- after the x-rays were
14 taken, did they bring you back to the same area with
15 the seat or did you stay near the x-ray machine?

16 A. I have no idea.

17 Q. Did they tell you the results of the
18 x-rays?

19 A. I don't recall.

20 Q. Did they look at any or examine any other
21 parts of your body other than your hand?

22 A. I don't know think so, I mean like, my
23 arms and stuff she touched and had me do things but
24 that's all hand related.

25 Q. And when they looked at your hand, you

1 were fully clothed, correct?

2 A. Yes.

3 Q. They did not ask you to undress or to put
4 on a gown.

5 A. Thank God they didn't.

6 Q. Did you see any cameras or recording
7 devices in the medical office when were you there
8 that day?

9 A. Absolutely not.

10 Q. After you got your x-rays, where did you
11 go?

12 A. I'm not sure the order of what happened,
13 remember, I don't know when I saw Novich but I know
14 I saw Novich before I left. I know they bandaged my
15 hand before I left, I don't know the order, I don't
16 recall.

17 Q. And where was Novich office in relation to
18 Dr. Kerlegrand was looking at your hand?

19 A. He's on this side you go in these doors
20 and she's on that side.

21 Q. So it's a separate office?

22 A. Well, like I said, it's a maze there's
23 office all around, but it's a maze. She's over
24 there, the doctors office is are over there, and
25 there's all offices up there and offices there and

1 his office you can go through this door. There's
2 the reception area with the glass doors, you can go
3 in this door where I went to see Dr. Kerelgrand in
4 medical. And if you go through this door, you can
5 see that Novich guy or if go in this door and they
6 take you around some way, you can get to Novich that
7 was too, I'm just not sure how.

8 Q. When you're getting off the elevator, you
9 get off into the reception area, correct?

10 A. Yes.

11 Q. Dr. Kerlegrand and where she looked at
12 your hand was to the right as you get off of the
13 elevator --

14 A. In the medical side, as far as I know is
15 the medical and the other side is the therapist.
16 That's the way I understand it, I don't know if
17 that's correct, but that's how I understand it.

18 Q. So Dr. Novich was to the left as you get
19 off the elevator?

20 A. That's where his office is behind the
21 glass door on the left side. It's a hallway you
22 walk in the glass door to the hallway then there's
23 offices, you understand it's not that I'm just going
24 from that reception area, I go from the reception
25 area into a hallway into his office.

1 Q. Understood. And how long did you meet
2 with Dr. Novich on that day?

3 A. I have no idea.

4 Q. Do you recall what it is that you spoke
5 about?

6 A. I talked to him about how I was assaulted
7 by Diannae Elher.

8 Q. And what if anything did he say?

9 A. I have no idea.

10 Q. Did you talk about anything else with Dr.
11 Novich?

12 A. Not that I recall, maybe I said something
13 about the workspace and how it was his fault
14 possibly that I got assaulted because he forced me
15 back knowing that the workspace was no good, it's
16 possible but I have no idea.

17 Q. Did you speak with Dr. Novich in his
18 office?

19 A. To the best of my recollection, yes.

20 Q. Was it just you and him?

21 A. Well, that's a gray area. What happens is
22 you talk to him, he runs out the door and talks to
23 somebody else and then he comes back and says one
24 thing and then he runs out the door and says
25 something -- sorry --

1 Q. Ms. Talarico, that is not the question,
2 the question is when were you in the office with him
3 --

4 A. It was just him and I.

5 Q. And was he seated behind a desk during
6 that conversation?

7 A. I believe so.

8 Q. And were you seated in a chair or
9 something on the opposite side of the desk?

10 A. Maybe, maybe I was standing, I'm not sure.
11 I don't recall how long I was there I have no idea
12 honestly. There were chairs.

13 Q. Do you mentioned that your hand was
14 wrapped in a bandage, do you recall if your hand was
15 wrapped in when you were in the office with Dr.
16 Novich?

17 A. I have no recollection. I'm not sure what
18 order how everything went down.

19 Q. Who wrapped your hand?

20 A. I don't recall, it was wrapped from here
21 all the way around -- well, somebody else on the
22 phone told me to keep my hand up so the swelling
23 wouldn't get bad.

24 Q. After you left Novich's office, what did
25 you do next?

1 A. I don't know because I don't know the
2 order in which anything happened. At some point, I
3 was in front of at that into the medical area in
4 between I was in front of that desk where they make
5 appointments. And over here is your therapy, over
6 here is your medical, and I was there because while
7 I was downstairs putting in my police report, I did
8 ask Port Authority Policy Dictates and I called the
9 inspector generals office for the help. And the
10 detective that answered Marinko [sic] I think his
11 name was -- Martinko something like that, Marinko
12 was Steve, that's a different one. Martinko, I
13 don't know I have his name written down and he told
14 me he would call me back as I standing at the end of
15 my (inaudible). I don't know what order but when I
16 was all done with everybody, my cellphone rings and
17 it's the inspector generals office and it's that
18 detective he says, Ms. Talarico, I'm sorry, I just
19 want to let you know we don't handle these types of
20 matters. And I actually laughed and I said, you
21 know what maybe someday I can call the inspectors
22 generals office and you'll actually do something to
23 help me and goodbye.

24 Q. What did you do after that phone call?

25 A. I was taken back and they were waiting for

1 me downstairs and they took me back to Lincoln
2 Tunnel and I had the note that they would put meet
3 out of work again and I also received an appointment
4 while I was at that desk before the phone call or
5 during it. That they were sending me to a hand
6 specialist the next day, under workers compensation
7 and nobody ever filled out an IOD report, which they
8 should have, because I couldn't I was out of work
9 the managers should have.

10 Q. And did you actually see somebody from
11 Workers Comp?

12 A. Yes.

13 Q. Do you recall who?

14 A. His name?

15 Q. Yeah?

16 A. No, but it's all in the records, they've
17 got it.

18 Q. Do you recall where?

19 A. I want to say it was in Bloomfield, I
20 actually saw him that day and then I had to go back
21 I think a week later, again, I think it was a week
22 I'm not sure. And I think it was Bloomfield, I
23 wonder if his name is in my contacts.

24 MR. KROMM: We can put a space in the
25 transcript and you can fill it in at a later

1 point in time.

2

3

4 Q. Just to go back just for a second, I know
5 you mentioned when you were in the medical office
6 not on Dr. Novich's side but Dr. Kerlegrand side,
7 you said that Mary Burke was there, correct?

8 A. She was in the room when I was being
9 examined, I'm pretty sure.

10 Q. And she's a nurse with OMS, is that
11 correct?

12 A. Right, and there was some other nurse
13 there or something, I don't know who she was.

14 Q. Well, A, you don't remember who the other
15 nurse was?

16 A. No.

17 Q. Do you remember where that other nurse was
18 located?

19 A. No, they were in and out people, were in
20 and out they were in and out.

21 Q. Do you remember what the other nurse
22 looked like?

23 A. No, but she's on the video, she's in the
24 video.

25 Q. As far as you can recall, you saw two

1 nurses there and Dr. Kerlegrand on that side of the
2 medical office?

3 A. To the best of my knowledge as I recall, I
4 think, it's been a long time.

5 Q. After you went you said you went to see
6 the Workers Comp specialist?

7 A. Yes.

8 Q. And did there come a time when you went
9 and filed a criminal complaint against Diannae Ehler
10 at the Weehawken Court.

11 A. Absolutely.

12 Q. And when did that occur?

13 A. What happened is I went back to the
14 Lincoln -- well, you want to know what really
15 happened, how this happened?

16 Q. Of course?

17 A. On my way back or on my way back to
18 medical I called a very respected chief of police
19 that I know and I told him what the captain did and
20 that he refused to take my charges. And this chief
21 advised me, he said Charlene, go back to the Lincoln
22 Tunnel and give the captain the opportunity to do
23 the right thing. It's not up to him to decide if
24 something is a criminal level or not, that is
25 decided by a judge so you back to the Lincoln and

1 give him the opportunity.

2 Q. And who is the chief that you spoken to?

3 THE WITNESS: Do I have to tell him that?

4 MR. SOTO: Yes.

5 A. Christopher Trasillo [sic] now the Chief
6 of New Jersey Transit prior he was the Chief at the
7 Port Authority. I went back to the Lincoln Tunnel,
8 I went upstairs my hand was all bandaged to give
9 them my slip, to give Zanobia my slip saying I was
10 out of work. Jerry came out and he turned white
11 when he saw my hand all bandaged. I went downstairs
12 and I got in my car because remember now the
13 lieutenants and the sergeants they were screaming at
14 me, don't go to the police, don't go to the police.
15 I got in my car and I called the Weehawken Police
16 Department and Sergeant Johnson answered the phone
17 and I said, I need to press criminal charges, I was
18 assaulted at work, I work at the Lincoln Tunnel or
19 something to this effect, and what should I do, he
20 said dear, you come right up here to the police
21 department which is what I did.

22 Q. And was that the same day?

23 A. Absolutely.

24 Q. Did there come a time when you learned
25 there this was something procedurally incorrect

1 about that initial complainant?

2 A. I'm not sure what you're asking me.

3 Q. Did the prosecutors office at some point
4 contact you?

5 A. No.

6 Q. You never spoke with an assistant
7 prosecutor in Weehawken?

8 A. An assistant prosecutor in Weehawken, I
9 spoke to Lauren Alavere [sic] who was the prosecutor
10 and I spoke to Stephanie Desiree who was the Hudson
11 County prosecutor A.K.A. Lauren Alavere's boss, but
12 I don't know who any assistant prosecutor is unless
13 Stephanie is an assistant prosecutor.

14 Q. So you did speak with a prosecutor from
15 Weehawken?

16 A. Not until I had to go to court.

17 Q. And when did that -- when did you have to
18 go to court?

19 A. Who knows, I went to court a million
20 times to try to get the judge to take the proper
21 charge. Do you want to know what happened at the
22 police station when I got there?

23 Q. When you first got there?

24 A. Yes.

25 Q. When you spoke with --

1 A. Sergeant Johnson?

2 Q. Correct, sure?

3 A. I get to the police station, Sergeant
4 Johnson has me sit down and he starts taking -- I
5 tell him what happened. He starts writing it up, I
6 bring him a copy of what I come learn after the fact
7 the incident report that I had given to Sergeant
8 Flemming, Sergeant Flemming gave me a copy of it.
9 So Sergeant Johnson read the incident report and he
10 goes in the back room and he comes back and he says
11 oh, my Lieutenant is on the phone with the captain,
12 oh, back up. I went to the police as Chief Trasillo
13 told me to do when I got back to the Lincoln and
14 Scotty Kellerhar answered the door and I said I need
15 to speak to the captain and he said the captain is
16 not here, I said listen, I talked to a Chief and I
17 need to speak to the captain, Scotty Kellerhar got
18 all nasty, smashed the door as I'm still talking
19 closes the door on me and doesn't help me at all. I
20 go to the car, I call the Weehawken Police
21 Department, Sergeant Johnson tells me to come right
22 up. I go in, I have with me the paperwork from
23 medical that shows that I had to go to a hand
24 specialist the next day. I have the incident report
25 that I learned was an incident report that Sergeant

1 Flemming had given me, he starts writing up the
2 complaint, he gets up and goes in the back room and
3 he says oh, my Lieutenant's on the phone with the
4 captain, I said what do you mean, the captain is not
5 at work. Oh, well they know each other, they're
6 friends so he's on the phone don't worry about. So
7 then he sits down and I tell him that I want to
8 press charges for a simple assault because it was a
9 soft tissue injury, and he says well, okay, so he
10 writes that down. And then he says to me, well, you
11 know there's another charge we should add and I said
12 well, what do you mean, you're the expert, I don't
13 know, he says well, it's harassment forcible
14 touching. I'm like, well, I don't know what is that
15 well, she pushed you so and then she tried to rip
16 the phone out of your hand. So anyway, I didn't
17 know I had a choice, I thought he was the expert and
18 knew what he was doing, so of course he puts
19 harassment and forcible touching and simple assault,
20 okay, they're both on there. It goes to the judge,
21 they call the judge, they go away, they call the
22 judge, he comes back and says the judge won't accept
23 the simple assault charges which is ridiculous, he
24 will only take the harassment charges so we do that.
25 Then a few days go by and Sergeant Johnson calls me

1 up again and he never gave me a copy of that
2 complaint and the prosecutor in Weehawken never saw
3 that complaint because then he has me come in and I
4 have to sign another complaint and I do. And again,
5 I spoke to Lauren twice I went before that judge in
6 Weehawken and was abused trying to get him to take
7 the proper charge, simple assault, that's what she
8 did and that's what should have been charged.

9 Q. And when you say you were abused is this
10 by the judge or the prosecutor?

11 A. Oh, my God the judge was so nasty to me,
12 it was like I was the criminal everywhere I went,
13 everywhere I went and until well -- well, get there.
14 I went before that judge two or three times it might
15 be three I'm not sure, but at least twice I went
16 before that judge and the last time I went the
17 prosecutor said, don't worry Charlene, he's going to
18 take the simple assault charges, but guess what, and
19 he wouldn't he refused. And then he got nasty again
20 and said you got to stop, you can't be saying this
21 okay, fine. So now go we pretend we're going to
22 have this trial and eight guys, eight detectives
23 from the Port Authority show up to this poor little
24 lonely prosecutor in Weehawken and it just went on
25 and on and on and on.

1 Q. When you say that you had the trial, when
2 did that occur?

3 A. Well, we went a long way before the trial.

4 Q. But to be fair, when you said you had a
5 trial you're referring to the ultimate trial where
6 Diannae Ehler was --

7 A. Which was after, we went through a court
8 in Weehawken numerous times and people just ignored
9 subpoenas it didn't matter the judge do anything to
10 anybody but harass and abuse me. Then we get to a
11 point where the judge says on the record, I was
12 going to retire but I decided to stay here until
13 this case gets settled, so that the new judge
14 doesn't have to deal with it. I left that court
15 room thinking finally I'm going to get justice
16 because politics don't matter. The next time I'm
17 supposed to go to court, guess what happens, the
18 judge retires, the prostitute is made the judge and
19 they transfer it to Union City where Captain
20 Gonzalez had just recently retired from.

21 Q. So after the case was transferred to Union
22 City, did you meet with another prosecutor?

23 A. Yes, TJ Oleg [sic].

24 Q. Ms. Talarico, when was this case transfer
25 today Union City?

1 A. It was after I saw the filming of my
2 medical because the Weehawken prosecutor told me
3 that Detective Guant [sic] told her and sent her an
4 email stating that my medical examination wasn't
5 taped and that that wasn't a doctor. So I had her
6 send it to me and then she refused to send it to me
7 so I went over her head to the Hudson County
8 prosecutor. I also went to the N.Y.P.D because the
9 medical examination took place in New York so I had
10 to get the N.Y.P.D. to confirm that Dr. Kerlegrand
11 was in fact a doctor because Detective Guant of the
12 Port Authority Inspector Generals office said that
13 she was an administrative assistant.

14 Q. Ms. Talarico I need to ask about this.
15 This is what I'm trying to get to approximately when
16 did you first learn that there was a recording or
17 some sort of filming of Dr. Kerlegrand looking at
18 your hand?

19 A. Well, because I pressed charges I asked
20 for discovery. The prosecutor gave me a whole bunch
21 and in the discovery unbeknownst to me, the Port
22 Authority films you of pretty much everywhere even
23 in the elevators. But the first set of discs I got
24 because they're like surveillance discs, you need a
25 special reader to look at it, they wouldn't work.

1 So then she sent me another set of discs in the mail
2 to my house.

3 Q. When you say she, are you referring to
4 Lauren Alavera?

5 A. The prosecutor, yes.

6 Q. This is the initial prosecutor?

7 A. The Weehawken prosecutor now the judge.
8 She sent me a package in my mail to my home address
9 and I want to say it was like over like right before
10 new years weekend I'm pretty sure of which was many
11 you know a long time since this whole thing started.
12 And when I got the mail which you have pictures of
13 I'm sure, somebody opened the mail, took the disc
14 out, threw in a couple of magazines. They tampered
15 with the mail and stole the disc out of it and had
16 to continue to be sent to my house. As soon as I
17 got that mail, I called the Weehawken prosecutor of
18 course no one answers the phone. I called the
19 Hudson County prosecutor of course no one answered
20 the phone. I called the Chief of police in my own
21 town, Kenneth Erinburg [sic] and he told me to
22 immediately go to the police station with it and put
23 in suspicious event and he has the package up there.
24 And they tried to get fingerprints and they called
25 the postal inspector and stuff and the Weehawken

1 prosecutor said that she put in mail and the
2 Weehawken Court but somebody tampered with the mail.
3 So then sometime after that, I'm pretty sure I
4 physically went to the prosecutor in Weehawken to
5 get a set in the discs.

6 Q. And you went down to Ms. Alavere's office
7 to try to get the disc?

8 A. I'm pretty sure that's how I got them
9 finally, I can't swear to that but I think finally
10 after the mail being stolen and everything, I think
11 that's how I finally got them.

12 Q. And approximately when was this that you
13 went down to the office to get the disc?

14 A. Sometime after they stole them the last
15 time and before I saw it, I don't know.

16 Q. Was this in 2017?

17 A. I don't know what year it was.

18 Q. Well, do you remember when -- I'm going to
19 try to give like a frame of reference here, do you
20 remember when the trial was?

21 A. I know it was four years last week that I
22 was assaulted, the trial took forever, I don't even
23 know. Off the top of my head, no, I can't remember
24 dates.

25 Q. But you received the videos at some point

1 before the trial, correct?

2 A. Part of the trial was going on in
3 Weehawken you know, there was stuff going on before I
4 got all of the tapes.

5 Q. When I say trial, I'm referring to what
6 you see on T.V. when people are going up there on a
7 stand and you're in front of the judge and you're
8 giving your testimony. I'm not talking about the
9 discovery process or meeting with the prosecutor,
10 I'm talking about just purely the trial and the
11 trial only?

12 A. To the best of my knowledge, when we got
13 to Union City, I already had the disc. Yeah,
14 because Lauren Alavere said that Detective Guant
15 said there wasn't a doctor so of course I had the
16 disc, absolutely I had the disc before Union City --
17 I'm trying to think.

18 Q. And when you got the disc from Ms.
19 Alavere, did you review the recordings in her office
20 or did you review them somewhere else?

21 A. In my house.

22 Q. So you picked up the disc and went back
23 home?

24 A. Yes.

25 Q. And when you -- did you look at them right

1 away when you got back?

2 A. No, no, it was hours of discs, hours, it's
3 everything I did that day.

4 Q. When did you sitdown and look at the
5 discs?

6 A. It was some night I was sitting in my
7 living room and looking at them. Off the top of my
8 head, I don't have the exact date, I know you do. I
9 know because we had to have the exact date or
10 approximate date before we put the lawsuit in, the
11 approximate date, I don't know off the top of my
12 head.

13 Q. If I said that February 2, 2017 would that
14 sound about right?

15 A. I think that might be near, yeah.

16 Q. And again, this was in your home?

17 A. Yes, I was by myself in my -- well, the
18 dog and I.

19 Q. And what do you recall doing?

20 A. I couldn't believe it. I couldn't believe
21 it. First of all, I was shocked that everywhere I
22 went in the elevators and everything they had me on
23 tape which I never knew. Especially after I know
24 the terrible things and Jerry was trying to say I
25 was acting crazy that day when it's clear on tape

1 that I was calm as a cucumber. You know, other than
2 maybe being a little upset but I wasn't acting like
3 he was talking about. Then all of a sudden I see my
4 entire medical examination with Dr. Kerlegrand, the
5 entire thing. I couldn't even wrap my head around
6 it, I called my girlfriend we must have been on the
7 phone for two or three hours, I was like shocked.
8 Like bad enough all the rotten things the Port
9 Authority did to me but now HIPPA violations.
10 They've destroyed my reputation and everything else
11 and now they're filming my medical, I still can't
12 wrap my head around it. Like do they know no
13 bounds, does justice and truth and honesty mean
14 nothing?

15 Q. And the examination that you viewed on the
16 recording, this is what you were referring to before
17 when Dr. Kerlegrand was asking to move your hands
18 around?

19 A. It was my entire medical examination with
20 Dr. Kerlegrand. Every single thing that Dr.
21 Kerlegrand is right there on the tape and me.

22 Q. And obviously the recordings speak for
23 themselves but when you say that everything in the
24 examine, you mean when she was asking you to move
25 your hands?

1 A. Whatever she did, she touched me, I don't
2 know exactly everything she did. I don't know if
3 somebody took my -- I don't know, I don't recall.
4 All I know is, my entire medical examination is on
5 tape.

6 Q. When you viewed it, did you see anyone
7 taking your temperature?

8 A. I don't -- I didn't watch it twenty
9 million times. First of all, it's hard to see --
10 it's not hard to see the tape when you see it but
11 have you to got to get to the point. So did I see
12 the doctor touching me, and doing all sorts of
13 stuff, yes. Do I know if I anybody took my
14 temperature or did any of that, I don't know, I have
15 no idea.

16 Q. So you didn't see that?

17 A. I don't know. I don't know other than the
18 fact that there's all of this stuff with me nosing
19 and her putting her arms on me and stuff, her hands
20 on me, that's all I can swear to and thank God I had
21 my clothes on.

22 Q. What did you do after you saw the
23 recordings?

24 A. It was nighttime, I called my girlfriend
25 we were on the phone for a few hours, I was applaud,

1 she was applaud. How do you do that someone's
2 medical examination was filmed.

3 Q. At this time, were you treating with the
4 therapist that you had referenced earlier Depice?

5 A. Over the course of many many years I've
6 seen Gary, I'm pretty sure during this time I was
7 seeing Gary, could I swear that I was, I honestly I
8 don't know if I was seeing him prior to, I mean I
9 did discussion a lot of it -- I don't know, I guess
10 yes, I'd say but I'm not sure.

11 Q. As part of your treatment with Dr. Depice,
12 did you discuss these recordings at all?

13 A. I discussed it with every single person
14 including Chairman O'Toole [sic] Deborah Torres,
15 everybody --

16 Q. That's not answering the question, did you
17 --

18 A. I discussed it with everybody, including
19 Chairman O'Toole, Deborah Torres, anybody that I can
20 possibly think of and call. The person in
21 Weehawken I called, what should I do.

22 Q. As part of your treatment with Dr. Depice,
23 did you talk about the incident with the recordings?

24 A. I'm sure I talked to -- I also talked to
25 doctor -- oh, my God why can't I think of her name

1 -- oh, my God I see her name -- doctor --

2 MR. SOTO: You can leave a blank.

3 THE WITNESS: She at Port Authority, the
4 one I went to first -- Francis, Dr. Francis,
5 I'm sorry, I couldn't think of her name.

6 Q. Outside of Dr. Francis and any Port
7 Authority, psychiatrist, psychologist, therapist I'm
8 including them all into one category, okay, have you
9 spoken to any other psychiatrists, therapists,
10 psychologists about this incident other than Dr.
11 Francis and Dr. Depice?

12 A. No, I haven't been to any.

13 Q. But to be clear, you have treated with Dr.
14 Depice and you've spoken about this incident with
15 the recordings, correct?

16 A. I would assume since I talked to him about
17 everything and all the abuse at the Port Authority
18 so I would assume that that was also part of it, I
19 would assume.

20 MR. KROMM: Counsel, we're just going to
21 ask for a --

22 MR. SOTO: Supplemental HIPPA?

23 MR. KROMM: Yes, HIPPA supplemental --
24 yeah, the whole nine yards and we'll follow-up
25 in writing.

1 Q. And I apologize if you feel that I'm
2 repeating myself but it's important that I be clear
3 about this. Other than Dr. Depice, no other
4 therapist or psychologist or psychiatrist you have
5 --

6 A. Dr. Francis.

7 Q. I'm not including PA ones, I'm including
8 --

9 A. I said, no.

10 Q. Let me finish. No doctors that you have
11 sought out on your own, personal therapist, personal
12 psychiatrist?

13 A. Not that I'm aware of, not that I recall.
14 I've spoken to my gynecologist, I've spoken to my
15 primary care, everybody that's a doctor that I go to
16 knows everything, so do I have any other therapist
17 or -- no, that I recall that I have.

18 Q. Have have you spoken to your primary care
19 physician about your feelings about being recorded
20 on August 2016?

21 A. I've spoken to my gynecologist. I've
22 spoken to my medical doctor but just telling them
23 what happened.

24 Q. Telling them what happened about when you
25 viewed the recordings?

1 A. Right, the whole thing. The lawsuit, the
2 workspace, every rotten thing the Port Authority has
3 done to me --

4 Q. For purposes of this question, I'm not
5 asking about whether you spoke to them about the
6 cubicle or the alleged assault by Diannae or
7 anything along those lines. I'm only asking
8 specifically about whether or not you spoken to your
9 primary care physician or your gynecologist about
10 your discovery and feelings about being recorded in
11 August of 2016 during the medical examination?

12 A. The only way I can answer that to be
13 honestly and truthful is to say that I talked to my
14 gynecologist and my former -- he wasn't really my
15 primary care, he was my thyroid doctor who had since
16 had a stroke and is no longer practicing. I spoke
17 to him about everything rotten thing the Port
18 Authority ever did to me.

19 Q. So presumably that would include the
20 recording as well?

21 A. Everything terrible thing the Port
22 Authority did to me.

23 Q. Okay, and what is the name of your
24 gynecologist?

25 A. Drew Rubenstein.

1 Q. And what is the name of the thyroid
2 doctor?

3 A. He's no longer practicing, he went blind,
4 he had a stroke, Michael Goldman.

5 MR. KROMM: Again, Counsel we're going to
6 ask for HIPPA authorizations and updated
7 supplemental responses for Doctors, Rubenstein
8 and Goldman and we will follow-up in writing.

9 Q. Other than Doctors, Rubinstein and
10 Goldman, were there any other doctors, therapists,
11 psychiatrists, medical professionals, anybody at all
12 that you spoke to after discovering the recordings
13 that you spoke to about those recordings?

14 A. Honestly, anyone that I came in contact to
15 that the Port Authority came up about, I spoke
16 about.

17 Q. Ms. Talarico, that's not the question.
18 I'm not talking about people in generally, I'm not
19 talking about --

20 A. No, but I'm saying any doctor that I
21 saw, anything I don't go to a lot of doctors, but
22 anywhere I went, I would tell them because it was
23 just such (inaudible) thing. I probably had a
24 conversation with Dr. Fisher, I'm sure I had
25 conversations with people in HR, I probably had one

1 with Robin Martin and how they did that --

2 Q. Ms. Talarico, what I'm asking about is not
3 people that you've spoken to perhaps family,
4 friends, colleagues about these recording. What I'm
5 talking about are, doctors or medical professionals,
6 therapist or psychologist that you have spoken to or
7 may have mentioned or talked about these recordings
8 to, okay. So that's the question, other than Dr.
9 Rubinstein and Dr. Goldman and the Port Authority
10 doctors that you spoken about, were there any other
11 doctors?

12 A. Every doctor I've probably been to, so
13 lets see, my eye doctor, Dr. Frasca [sic] I'd tell
14 anybody because it's just so appalling. So do I go
15 to a lot of doctors, not really. I'm trying to
16 think who else in the past few years, luckily, I'm
17 relatively healthy. I might have even told the
18 doctor at Urgent Care for all I know, I'd tell
19 anybody because it's just so appalling to me, so I
20 don't honestly -- you know.

21 Q. I got to take this one step at a time now.
22 So you spoke to your eye doctor, Dr. Frasca,
23 correct?

24 A. Yes.

25 MR. KROMM: We're going to call for an

1 authorization, a HIPPA authorization for Dr.
2 Frasca medical records and we will follow-up in
3 writing.

4 Q. You said you spoke to a Urgent Care
5 doctor?

6 A. I have no idea who or when. All I'm
7 telling you is I tell anybody I see and I'm being
8 perfectly honest.

9 Q. What other doctors?

10 A. I don't think I have any other doctors. I
11 don't know, did I tell my dentist, chances are I
12 tell everybody, I don't know.

13 Q. What is your dentist's name?

14 A. He just closed his practice, what is his
15 name doctor -- Dr. Sue [sic] I don't know where he
16 is now, he closed his practice because of covid.

17 Q. But you believe you spoke to Dr. Sue about
18 --

19 A. No, I don't know but knowing me, I tell
20 everyone.

21 MR. KROMM: I'm going to call for a HIPPA
22 authorization for Dr. Sue and just so the
23 record is clear, as well, we're also going to
24 be asking for a HIPPA authorization for Dr.
25 Francis who requires a separate one for the

1 Port Authority OMS and we'll follow-up in
2 writing for that as well.

3 THE WITNESS: So what does that mean, does
4 that mean that they're trying to get all of my
5 medical records to all of the doctors I ever
6 gone to, is that what this means?

7 Q. Ms. Talarico, now I would like to talk a
8 little bit more about you know about these the
9 doctors that you have mentioned and how you know
10 you've spoken to them and about the recordings, the
11 recordings of the discovery, did you talk to any of
12 these doctors about how you felt?

13 A. I'm sure I told them I was appalled and
14 how awful it is and how you can't trust anybody
15 anymore and you can't trust Port Authority I'm sure
16 I said all that, I'm sure.

17 Q. And to be clear, your complaint here that
18 you filed in Federal Court you're not alleging any
19 physical injuries, correct?

20 A. Physical meaning, my arm is broken or
21 something?

22 Q. Correct?

23 A. No, Diannae Ehler assaulted me and injured
24 me but that has nothing to do about the filming of
25 my medical, that's how it came about but that's not

1 what caused --

2 Q. Correct, I just want to make sure that
3 we're all clear the damages that you're alleging
4 against the Port Authority. So you're not alleging
5 or claiming any physical damages on part of the Port
6 Authority, correct?

7 A. You mean physical boldly injury?

8 Q. Correct?

9 A. A physically boldly injury I did not have.

10 Q. You are alleging emotional distress and
11 damages related to your discovery of the recordings,
12 is that correct?

13 A. Yes.

14 Q. And can you tell us in that context how
15 your discovering of the recording has affected you?

16 A. How could it not affect me. You can't
17 trust anybody, anywhere, anything. You know, they
18 broke the law. People that I respected they've
19 destroyed -- the Port Authority has been successful
20 because of -- plus the response on top of everything
21 else, is the medical. They've destroyed my belief
22 in the justice system, the legal system, the police,
23 the Port Authority itself, the Port Authority
24 management. And then to find Dr. Fisher was the one
25 who told me years ago to go to PA medical, to go to

1 the IG's office for help from the abuse of the
2 Lincoln Tunnel and I did what Dr. Fisher said and
3 that didn't help. And then Dr. Fisher turns out to
4 be the person who's in charge of the department
5 where they filmed my medical. If you don't live
6 this, you don't understand what it does. You know,
7 it's ruined relationships, I've lost friends over
8 it. I've lost sleep, I can't get promoted, my
9 reputations destroyed. The Port Authority put in
10 the newspaper that they didn't film my medical, my
11 reputation means something to me.

12 Q. I want to speak a little bit more about
13 the tangible ways that it has affected you, you
14 mentioned that you've lost sleep over it, can you
15 tell me a little bit more about that?

16 A. You don't sleep when you're constantly
17 worried because and you don't know what the Port
18 Authority is going to do next because they're
19 filming you here and they're filming you there and
20 everything against the law, they break laws, the
21 Port Authority broke the law.

22 Q. Any other affects on you tangible affects
23 like that you can describe as a result of this?

24 A. I lost relationships with people because I
25 wouldn't back down and let the Port Authority get

1 away with what they did to me. I've lost sleep,
2 I've lot family members, I could be stressed, I'm an
3 emotional wreck -- I'm sorry, I don't know what more
4 you want, okay.

5 Q. Now, the stress that you mentioned this
6 is -- you're claiming that this is a direct result
7 of learning about the videotapes, is that correct?

8 A. It's a direct result of the Port Authority
9 and all the things they did. Yes, did the videotape
10 create more, yes, do you think I can go in a doctors
11 office and not look around and say, wow, I wonder if
12 I'm not being filmed today.

13 Q. Ms. Talarico, it is important that you
14 attempt to try to differentiate how you feel towards
15 the Port Authority in generally because of your
16 other grievances as oppose to specifically how
17 discovering the recording has affected you. This
18 has nothing to do with the cubicle, this has nothing
19 to do with relations with supervisors or anything
20 else --

21 A. It has nothing to do with those all of
22 those terrible rotten, refusing to help me --

23 Q. Ms. Talarico, it cannot because that is
24 not what is in this complaint. What you are
25 alleging and what is before this judge and the court

1 is the recording, and what I am entitled to and what
2 I'm asking you about is how that incident and that
3 incident alone has affected you. So please, if you
4 can tell us how tangible affects of how the learning
5 about the recording has affected you and your mental
6 well-being?

7 A. I don't even know how to be more specific
8 then you got to look now everywhere you go. Is
9 there a camera, are they doing this. You don't
10 sleep because you're worried about it. You're
11 wondering what else the Port Authority is going to
12 do to you if they can stoop so low to film your
13 medical examination. You don't sleep. You got
14 people who -- you go to board meetings to try to get
15 help and you tell help them they filmed the medical
16 examination you send a letter to where and you know
17 asking and nobody cares, nobody cares in the Port
18 Authority so of course it affected me. Do you know
19 how many people thought I was lying, would you like
20 to see the Facebook post when the article was put in
21 the paper, oh, she's a liar, they didn't film her.
22 And it still affected every part of my being on top
23 of every other rotten thing Port Authority did to
24 me. So I don't know how to break it down any better
25 than that, I'm sorry.

1 Q. Do you still have these Facebook post?

2 A. It's on Facebook, it's not my post, it's
3 on the Port Authority site.

4 Q. But do you have copies of these?

5 A. No, I didn't print them out. No, seeing
6 them once was enough. Also, seeing the article in
7 the paperwork the Port Authority is saying they
8 didn't do it making me a liar in the newspaper. And
9 if nothing else you'll get from me, my reputation
10 matters to me. And the Port Authority has done
11 nothing but try to destroy it and the biggest
12 mistake I ever made in my life was coming to work
13 here but I thought this agency was something
14 different (inaudible) lost his life for this agency
15 and I wanted to give back to people that were there
16 for me and nice to me and all I've been was abused
17 since I've been here. And I still do my job
18 everyday, and I still have perfect attendance and I
19 still care about my work.

20 Q. Ms. Talarico, do have you any other screen
21 shots of any social media posts regarding you and
22 the recording incident?

23 A. I don't have any screen shots, it's on
24 Facebook. Somebody posted the article and the
25 criminal complaint was put out and somebody posted

1 the article and then people wrote nasty stuff after
2 it.

3 Q. You've told us about sleepiness and you've
4 told us about you know, being called a liar on
5 social media, is there anything --

6 A. Port Authority called me a liar in the
7 newspaper, in the newspaper they said they did not
8 film my medical, that relates to me being called a
9 liar, it does, it may be not be your legalese but to
10 any one else that read it, it means she's lying.

11 Q. And is again, is there anything else other
12 than the stress and sleeplessness and reading of
13 certain social media post and media reports about
14 the incident?

15 A. How about going to work and people
16 thinking you're lying. How about all the people
17 that thought I was lying, it was the until I went to
18 27 board meetings or 26 board meetings when people
19 started believing me about all the things the Port
20 Authority did.

21 Q. Ms. Talarico, we have to maintain focus in
22 this line of questioning needs to only to be in
23 reference to the affects on you of discovering the
24 video recording, not of the other matters. So
25 please and to the extent that you can keep this

1 narrowly confined to that, you need to do that. Are
2 there any other --

3 A. I can't get promoted, I can't do anything
4 because they think I'm a lair, do you understand.
5 It's all related, it's all related, it's all
6 related. You may just talk about the filming of my
7 medical, but it's all relates to a -- it's a -- what
8 do you call it -- it's a culture or system you go
9 after and you just keep doing more bad things to
10 somebody and this time I saw - the detective from
11 the Port Authority lied, and said that it wasn't a
12 doctor or video, do you know how I got treated by
13 the N.Y.P.D police until I found a nice cop? They
14 told me, you don't go against a cop, do you want to
15 know how the Hudson County prosecutor office treated
16 me all because of the film of my medical. Or how
17 about the way the judge treated me, you know, I'm
18 sorry, it's all related, it's all related. But
19 filming of the medical, that's the part that
20 everybody is like oh, no, the Port Authority would
21 never do that.

22 Q. But that is what is before this court and
23 that's what your --

24 A. And that's the best I can give you.

25 Q. So you've described sleepiness, you've

1 described stress, you've described feelings about
2 being called a liar --

3 A. Losing relationship.

4 Q. Anything else?

5 A. I told you that I've lost relationships
6 because of it, I've been ridiculed because of it.

7 Q. Because of the recordings?

8 A. Yes, absolutely because they want me to
9 stop -- oh, the Port Authority wouldn't do that how
10 doing think I felt that day when I went to the Chief
11 securities office to go to work that first day? How
12 do you think I felt? You know the only thing that
13 keeps me going is the fact that I know the truth and
14 I will not stop until the truth is there.

15 Q. Ms. Talarico but we're talking about your
16 claim for emotional damages as a result of the
17 recording that you discovered so again --

18 A. I don't know what else to tell you.

19 Q. If you have nothing else to say on that,
20 that's fine but this is your opportunity to tell us
21 about any other tangible affects of discovering the
22 recording?

23 A. The tangible affects, my reputation has
24 been destroyed --

25 Q. You told us about that?

1 A. I can't get promoted because of my
2 reputation has been destroyed. People think I was a
3 liar. The Port Authority put in the newspaper I was
4 a liar. I don't sleep. I get upset -- what more do
5 you want from me?

6 Q. Are you alleging that you have not been
7 promoted as a result of being recorded during your
8 medical exam?

9 A. I'm going to say that it's part of it,
10 absolutely, I'm going to say it's part of it all
11 part of it. The problem is because I put forth to
12 stand up to the Port Authority, it's all part of it,
13 yes, you may want to try to separate it but it's all
14 parts of the whole thing.

15 Q. Ms. Talarico, I'm not trying to separate
16 it. You filed a complaint in regards to the
17 recording and the recording only so I need to know
18 are you alleging that you feel you were not promoted
19 because of the recording?

20 MR. SOTO: Objection, you can answer the
21 question.

22 THE WITNESS: Answer it?

23 MR. SOTO: Yes.

24 A. Yes, it's all part of it, absolutely,
25 absolutely. And the fact that I've gone to 26 board

1 meetings and talked about the fact that they filmed
2 me and tell anybody that listened, absolutely.

3 Q. Have you attempted to try to get any
4 promotions since the recording, since discovering
5 the recording?

6 A. I'm sure I have, I'm sure I've gone on
7 interviews and stuff, I'm sure who knows. Off the
8 top of my head, I couldn't really tell you, but
9 I'm -- yes, I'm sure I have. I was told by Katie
10 Rosen oh, no don't even apply we want somebody from
11 outside, that's not even right.

12 Q. Tell us about --

13 A. Since I've been at Olsack [sic] there was
14 a job and I want to say it was in labor, and Katie
15 Rosen said right to my face oh, no, don't apply for
16 that we want somebody from outside.

17 Q. And when did that happen?

18 A. I don't know the exact date, I would have
19 to look through all the jobs that were post and
20 stuff. Where was I then, was I there then -- I
21 don't know, I can't even anymore -- listen they've
22 done so many bad things to me.

23 Q. Ms. Talarico, we're just talking about the
24 recording. So you don't recall any specific jobs
25 that you applied to --

1 A. Yeah, that was a job in labor that I was
2 told not to.

3 Q. You need to let my finish, you don't
4 recall any specific jobs that you applied to after
5 the discovery of the recording that you believe you
6 were denied as a result of the recording?

7 A. Yeah, I believe I've been denied
8 promotions as a result of the recording, absolutely.
9 Claudia Dickey wanted to up my position as a 22 and
10 HR didn't let her and I believe it was a direct
11 result of the recording and all of what they've done
12 to me. And the Diannae Ehler situation, yeah, I do
13 I think there's lots of things that I've been
14 penalized and held back and against, yes.

15 Q. Now, also to be clear other than this
16 claim of not being promoted as a result of the
17 recording, you're not alleging any lost wages as a
18 result of this particular incident, correct?

19 A. The fact that I have to use up all of my
20 time to proving, vacation time, going to N.Y.P.D.,
21 yeah, I did lose money for that. I had to go to
22 N.Y.P.D, I had to go to the Hudson prosecutor. I
23 had to use up vacation time, I lost anyway you can
24 think of.

25 Q. Ms. Talarico, going to the Hudson

1 prosecutor, I am talking about the discovery and the
2 recording --

3 A. Yes.

4 Q. I'm not talking about the Diannae
5 incident?

6 A. No, it's because of the filming of my
7 medical I went to Hudson County and that's why I
8 went to the N.Y.P.D. because you filmed my medical
9 examination. I had to go to the N.Y.P.D. to prove
10 it was a doctor, then I had to take that to the
11 Hudson County prosecutor who I have a letter stating
12 the Detective Guant did in fact say it that it was a
13 administrative assistant and not a doctor on the
14 recording. So then I had to go -- because Lauren
15 Alavera the prosecutor in Weehawken now, the judge
16 in Weehawken told me about the email and everything
17 but wouldn't give it to me so then I had to go to
18 the Hudson County prosecutor Stephanie Desiree --
19 no, I have her name. Anyway, Elson Davis, Stephanie
20 Elson Devis, that's her name Hudson County
21 prosecutor who's Lauren Alavere's boss, I had to go
22 to her she made Lauren Alavere send me a letter
23 stating that Detective Guant did in fact say that it
24 wasn't a doctor that it administrative doctor
25 assistant. Again, the Port Authority said I was a

1 lair, again so now --

2 Q. Ms. Talarico, how does this relate to
3 you're losing wages as a result of --

4 A. Because I had to go to all these places, I
5 had to do it all on my time.

6 Q. Approximately how many days did have you
7 to take off?

8 A. I honestly don't know how many times I
9 went back and forth.

10 Q. And Ms. Talarico, in those days that you
11 took off you were not paid?

12 A. I used my time, my vacation time every
13 time I went to court, Diannae Ehler and everybody
14 went to court for free and I had to use up my time.

15 Q. We're not talking about the court case
16 again?

17 A. Yeah, just like today, I have to use my
18 vacation day just to do this.

19 Q. How many days did you not get paid from
20 the Port Authority for missing work as a result of
21 this, not get paid, not vacation days, I'm talking
22 about not get paid if any?

23 A. If I'm using my own vacation time, then
24 the Port Authority didn't pay me, I used my vacation
25 time.

1 Q. Okay, so you don't get paid for vacations?

2 A. Yeah. My vacation time I had to use to
3 follow through with the wrong doing of the Port
4 Authority for filming my medical and the lying to a
5 prosecutor.

6 Q. When you take a vacation day, you don't
7 get paid?

8 A. No, I get paid for it and you know it and
9 I know it but I shouldn't have to use my time.

10 Q. That's what I'm talking about. So you did
11 not in fact ever not get paid from missing a day for
12 this as a result of the --

13 A. Yeah, but I shouldn't have to use my time
14 for Port Authority wrong doing.

15 Q. That's a separate question, Ms. Talarico,
16 did you ever not get paid?

17 A. No, I told them one day without pay, I was
18 going to go to the newspaper, that's what I told
19 them all along.

20 Q. So you've been paid every day?

21 A. Absolutely using up my time that I
22 accumulated and worked for.

23 Q. So you have not been out any wages as a
24 result of the recording incident?

25 A. I am out wages, I'm out promotion wages.

1 There's no reason in the world who works hard and
2 who is exemplary employee is still a C21 who came to
3 the Port Authority with a bachelors degree with
4 honors that she had just recently got, so please.

5 Q. Ms. Talarico, I'm not referring to your
6 claim about missing promotions, I'm referring to
7 lost wages as in missing work and not being paid,
8 you did not any miss work --

9 A. No, I told you had to use my own time.

10 Q. But you got paid for that time?

11 A. Using my own time.

12 Q. But you got paid, correct?

13 A. Using my own time.

14 Q. Yes or no, Ms. Talarico, you got paid,
15 correct?

16 A. Yes.

17 MR. KROMM: At this point, I don't have
18 any further questions, however, we do reserve
19 the right to once we receive the HIPPA
20 authorizations and the medical records that
21 Ms. Talarico has referred to here today,
22 reserving the right to possibly have to bring
23 Ms. Talarico back to depose her on anything
24 that may arise in those records. However
25 subject to that reservation, I don't have any

1 further questions.

2 DIRECT EXAMINATION:

3 MR. SOTO: Just a couple of things I want
4 to clarify. When you mentioned the doctors you
5 had discussed the videotaping with, aside from
6 the psychologist specialist such as Dr.
7 Rubinstein, that's your gynecologist when you
8 discussed the videotaping with Dr. Rubinstein,
9 was that in the context of any treatment?

10 THE WITNESS: Not for medical, like,
11 gynecologically [sic] while I'm in the room
12 with him and stuff he would say, what's new and
13 I would update him on the latest part of the
14 saga.

15 Q. So would you say that when you were
16 discussing this with Dr. Rubinstein you weren't
17 discussing with him in his capacity as a medical
18 professional but conversationally?

19 A. Yeah, somebody you feel you can trust that
20 you can talk to.

21 Q. And the same with Dr. Goldman who is your
22 thyroid specialist, were you speaking about the
23 video in the context of your medical treatment with
24 him or conversationally?

25 A. No, more about what's going on in my life.

1 Q. So conversationally?

2 A. Yes.

3 Q. And then Dr. Frasca your eye specialist,
4 when you discussed this video with Dr. Fresca, was
5 that in the context of any medical treatment or
6 discussed it conversationally?

7 A. Same thing conversationally, all of them.

8 Q. And then Dr. Sue, the dentist, when you
9 discussed this matter with Dr. Sue, were you
10 discussing this for medical treatment or was this
11 just conversationally?

12 A. No, conversationally, like, people you
13 trust they're your doctors for years you can
14 converse with them. How you been, what is going on
15 in your life, like, that's it.

16 Q. And when we were discussing the impact
17 that the discovery of the video it had on you, you
18 discussed losing some sleep are you able to quantify
19 how much sleep you lost over this?

20 A. Lots of sleep, I don't even know how to
21 quantify, you know it's there it's something you
22 know --

23 Q. Is that something that happens up to the
24 day?

25 A. Yeah, of course.

1 Q. How many times a week would you say you
2 lose sleep over this?

3 A. Since the filming of my medical and losing
4 the last bit of trust I had in something, I don't
5 sleep good regularly now so I still lose sleep over
6 it.

7 (Continued on the next page to
8 include jurat.)

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

1 Q. Are you able to say how many times a week
2 that you lose sleep over this or is it just --

3 A. I don't know how do put a number on that,
4 you know.

5 MR. SOTO: I have nothing further.

6 (Whereupon, at 12:22 P.M., the
7 examination of this witness was
8 concluded.)

9

10

CHARLENE TALARICO

11

12

13

14 Subscribed and sworn to before me

15 this ____ day of _____ 20__.

16

17

NOTARY PUBLIC

18

19

20

21

22

23

24

25

I N D E X

1		
2		
3	INFORMATION AND/OR DOCUMENTS REQUESTED	
4	INFORMATION AND/OR DOCUMENTS	PAGE
5		
	INSERT	20
6	INSERT	62
7	SUPPLEMENTAL HIPPA	81
8	AUTHORIZATION	82
9	HIPPA AUTHORIZATION AND UPDATED	
	SUPPLEMENTAL RESPONSE FOR DOCTORS,	
10	DR. RUBINSTEIN & DR. GOLDMAN	81
11	HIPPA AUTHORIZATION FOR DR. SUE AND	
	HIPPA AUTHORIZATION FOR DR. FRANCIS	83

12
13
14
15
16
17
18
19
20
21
22
23
24
25

1 C E R T I F I C A T E

2

3 STATE OF NEW YORK)

: SS.:

4 COUNTY OF KINGS)

5

6 I, DANIELLE SHARELL BATTLE, a Notary
7 Public for and within the State of New York, do
8 hereby certify:

9 That the witness whose examination is
10 hereinbefore set forth was duly sworn and that such
11 examination is a true record of the testimony given
12 by that witness.

13 I further certify that I am not related to
14 any of the parties to this action by blood or by
15 marriage and that I am in no way interested in the
16 outcome of this matter.

17 IN WITNESS WHEREOF, I have hereunto set my
18 hand this 14th day of August, 2020.

19

20

21

DANIELLE SHARELL BATTLE

22

23

24

25

A	ago 35:22 39:17 85:25	29:7 31:11	47:4,6,16,25	attendance 3:12 14:6 89:18
ability 7:19	agree 6:2,11 22:10	anybody 28:13	48:11,12 51:21	attention 12:18 30:17
able 7:4 29:10,17 30:18 35:9 101:18 103:1	AGREED 4:9,12 4:15,18	30:7 38:11	52:1 54:1,17	attorney 3:10,17 4:3 5:16
absolutely 14:15 14:18 15:25 24:14 27:16 28:16 54:25 56:9 63:11 64:23 73:16 92:8 93:10,24 93:25 94:2 95:8 98:21	air 39:23 Alavera 71:4 96:15 Alavere 65:9 73:14,19 96:22 Alavere's 65:11 72:6 96:21 alive 16:18 17:2,5 alleged 80:6 alleging 84:18 85:3,4,10 87:25 93:6,18 95:17 allowed 14:9,15 15:3 17:19 23:17 38:23 42:8,8 53:8 allowing 17:15 alluding 21:17 Americans 28:8 analysis 22:11 AND/OR 104:3,4 Ann-Marie 18:24 anonymous 22:3 answer 3:6,10,14 3:14,17,18,19 3:20 6:25 7:6 7:14 10:24,25 11:10,15 15:11 16:6 18:13,14 18:16 36:18 49:11 80:12 93:20,22 answered 3:16 4:5 43:13 53:12 60:10 64:16 66:14 71:19 answering 44:15 77:16 answers 71:18 anxiety 28:7,8	45:20 46:9 69:10 76:13 77:19 81:11 82:14,19 83:7 84:14 85:17 94:2 anymore 84:15 94:21 anyway 27:1 41:14 67:16 95:23 96:19 apart 52:2 apologize 79:1 appalled 84:13 appalling 82:14 82:19 apparent 28:19 applaud 76:25 77:1 applied 94:25 95:4 apply 3:7 94:10 94:15 appointment 24:15 61:3 appointments 60:5 appropriate 3:7 4:16 approximate 74:10,11 approximately 17:3 19:14 20:20 21:19 26:5 32:16 33:5 33:5 36:24 44:23 45:11 46:16,19 52:9 54:3 70:15 72:12 97:6 area 11:9 12:2 37:22 38:10 45:23,25 46:19	55:14 57:2,9,24 57:25 58:21 60:3 arm 84:20 arms 55:23 76:19 arranged 29:22 29:25 arrived 32:19 33:9 article 3:7 88:20 89:6,24 90:1 aside 100:5 asked 16:2 22:21 23:2 31:13 46:17 47:3 48:18 49:3 50:13,15 54:8 70:19 asking 6:23 10:23 14:13 20:15 65:2 75:17,24 80:5,7 82:2 83:24 88:2 88:17 assault 67:8,19 67:23 68:7,18 80:6 assaulted 27:3 39:25 40:17 49:4,5 51:15 58:6,14 64:18 72:22 84:23 assigned 19:21 assistance 18:23 assistant 9:16 65:6,8,12,13 70:13 96:13,25 assume 38:14 45:17 78:16,18 78:19 attempt 40:6 87:14 attempted 94:3	attorneys 2:3,7 4:19,20 August 1:12 5:19 12:19,23 13:1 15:24 27:20,23 27:24 28:1,3,4 28:20 32:2,4,12 79:20 80:11 105:18 Authority 1:8,18 2:7,8 5:17,22 6:13 7:23 8:1,4 9:2 10:19 14:4 14:5,22 15:2,9 16:7,19 18:2 19:12,15 21:9 22:2 23:10 60:8 64:7 68:23 70:12,22 75:9 78:3,7,17 80:2 80:18,22 81:15 82:9 84:1,15 85:4,6,19,23,23 86:9,18,21,25 87:8,15 88:11 88:18,23 89:3,7 89:10 90:6,20 91:11,20 92:9 93:3,12 96:25 97:20,24 98:4 98:14 99:3 authorization 83:1,1,22,24 104:8,9,11,11 authorizations 81:6 99:20 available 35:3 Avenue 26:3,16 28:6 43:25 44:6 44:11,16,22

45:3,11 aware 27:25 31:7 79:13 awful 84:14 A.K.A 65:11 A.M 1:13 34:23	42:5 basis 3:11,19 Battle 1:19 105:6 105:21 bed 50:6,11,18 beg 15:8 begged 18:17 19:1 begging 17:10 24:2 25:2,3 behalf 1:2 belief 85:21 believe 9:15 13:19 27:12 31:25 35:19,19 35:25 54:22 59:7 74:20 83:17 95:5,7,10 believing 90:19 best 9:6 16:14 20:13,15 38:8 58:19 63:3 73:12 91:24 better 39:14,18 39:18 88:24 be;ieve 74:20 big 22:3 30:15 31:2,5 46:20,21 biggest 89:11 bill 15:7 bit 12:25 25:6 84:8 86:12,15 102:4 bizarre 42:9 blank 20:25 21:12 78:2 blind 81:3 blood 105:14 Bloomfield 61:19 61:22 board 88:14 90:18,18 93:25 body 55:21 boldly 85:7,9 boss 65:11 96:21 bounds 75:13	break 7:10,15 86:20 88:24 bridge 19:22,24 20:9 bridges 21:22 briefly 9:23 bring 55:14 66:6 99:22 brings 7:5 Broadway 2:4 broke 85:18 86:21 broken 84:20 building 45:9,10 45:10,12,14,16 45:18 bunch 34:17 70:20 Burke 53:7 55:1 55:7 62:7 bus 35:5 business 38:15	60:8 63:18 64:15 71:17,18 71:20,24 75:6 76:24 77:21 90:4,6,8 92:2 calling 22:19 calls 14:1 34:17 67:25 calm 75:1 camera 88:9 cameras 56:6 capacity 100:17 captain 40:13,14 40:18,24 41:3 63:19,22 66:11 66:15,15,17 67:4,4 69:19 captains 40:12 car 64:12,15 66:20 care 23:8 79:15 79:18 80:9,15 82:18 83:4 89:19 career 14:5 cares 88:17,17 case 69:13,21,24 97:15 cash 10:6 12:5,9 category 78:8 cause 3:17 caused 85:1 Cedric 17:21,22 18:5 ceiling 47:12 cellphone 35:16 35:18,20,23 36:1 51:16 60:16 center 2:9 9:2,4 12:12 certain 90:13 certify 105:8,13 Chaffey 18:7 35:4 36:10 chain 17:7,20	18:22 25:3 chair 22:16 39:4 39:5,9 50:7,12 50:17,20,23 51:3,9,12,22 52:2,10 53:4 59:8 Chairman 77:14 77:19 chairs 46:25 47:1 59:12 chance 43:7 chances 34:23 83:11 change 31:7 changed 9:8,18 9:21 28:13 42:7 character 6:8 charge 4:20 25:14 65:21 67:11 68:7 86:4 charged 68:8 charges 40:17,21 41:2,4 63:20 64:17 67:8,23 67:24 68:18 70:19 Charlene 1:2,16 2:3 5:8 23:24 23:25 42:3 63:21 68:17 103:10 charts 29:8 check 28:19 45:24 46:1 chief 8:9 20:1 63:18,20 64:2,5 64:6 66:12,16 71:20 92:10 choice 67:17 Christopher 64:5 City 8:12 69:19 69:22,25 73:13 73:16 Civil 3:4 civilian 12:11
--	---	--	---	---

claim 92:16 95:16 99:6 claiming 85:5 87:6 clarification 8:23 clarify 100:4 class 1:3 Claudia 11:12 95:9 clear 3:10,19 32:7 42:25 74:25 78:13 79:2 83:23 84:17 85:3 95:15 clearly 4:7 clerk 4:11 client 6:7,9 cliques 21:25 close 47:22 closed 30:10 48:8 53:9 83:14,16 closes 66:19 clothed 56:1 clothes 76:21 colleagues 82:4 come 12:6 24:17 27:23 29:17 30:12 31:4,13 31:15 34:20 35:10 36:4,12 37:13,25 38:18 41:18 42:1,2,4 42:13,14,15 46:17 47:3 63:8 64:20,24 66:6 66:21 68:3 comes 40:24 41:23 46:7 58:23 66:10 67:22 coming 37:8,9 49:8 89:12 command 17:8 17:20 18:22 25:3	comments 3:13 communicating 4:3 communication 4:2,4,6 communications 6:9 Comp 61:11 63:6 compensation 61:6 complainant 65:1 complaint 63:9 67:2 68:2,3,4 84:17 87:24 89:25 93:16 complete 3:20 compliance 3:4 concerned 28:2 concluded 103:8 conduct 3:1 4:1 6:16 conducted 5:21 6:3 confidentiality 3:15 confined 91:1 confirm 70:10 confirmed 31:18 consent 4:4 constant 15:21 constantly 86:16 contact 65:4 81:14 contacts 61:23 context 85:14 100:9,23 101:5 continue 71:16 continued 39:10 102:7 contract 26:10 26:10 28:5 43:20 contracted 13:23 controlling 4:16 conversation	59:6 81:24 conversationally 100:18,24 101:1,6,7,11,12 conversations 81:25 converse 101:14 cop 41:18 91:13 91:14 copies 89:4 cops 36:19 40:23 copy 4:19 22:22 22:23 66:6,8 68:1 corner 29:17 Corosis 42:14 Corporate 6:14 correct 5:23 6:4 6:5 7:23 21:16 21:22 25:9 26:18 27:15,20 31:14 32:12 33:18 44:6,7,17 44:20 48:5 54:21 56:1 57:9 57:17 62:7,11 66:2 73:1 78:15 82:23 84:19,22 85:2,6,8,12 87:7 95:18 99:12,15 Counsel 21:11 78:20 81:5 County 1:1 65:11 70:7 71:19 91:15 96:7,11 96:18,20 105:4 couple 6:20 47:1 52:12 71:14 100:3 course 3:12 18:6 18:18 63:16 67:18 71:18,19 73:15 77:5 88:18 101:25 court 1:1,17 3:16	4:11 7:1 41:12 41:12,13 63:10 65:16,18,19 69:7,14,17 72:2 84:18 87:25 91:22 97:13,14 97:15 covid 83:16 CPLR 3:8,12,18 4:13,15,16 crazy 37:14 74:25 create 87:10 criminal 25:15 40:17,20 41:1 63:9,24 64:17 68:12 89:25 CSO 8:19 12:10 CSO's 8:15 9:4 9:15,20 10:3 11:24 12:8,14 cube 30:4,6 37:24 37:24 38:1 cubicle 28:7,13 29:5,5,19,25 31:8 33:3,8,10 33:13,14,17 35:15 36:6 37:20,21,23 38:4 80:6 87:18 cucumber 75:1 culture 91:8 current 8:3 currently 7:18,22 8:8 curtain 48:5,6,7 48:8,8 50:21 52:4 curtains 47:11,22 50:5 53:9 cut 16:21 C21 8:5 9:10,17 99:2 <hr/> D <hr/> d 3:3 104:1	daily 9:20 damages 85:3,5 85:11 92:16 Danielle 1:18 105:6,21 date 1:12 8:22 9:7 12:20,23 20:22 74:8,9,10 74:11 94:18 dates 72:24 David 2:10 5:16 Davis 96:19 day 11:11 12:24 13:1 27:2,19 28:3 31:17 32:2 32:15 46:5 56:8 58:2 61:6,20 64:22 66:24 74:3,25 92:10 92:11 97:18 98:6,11,17,20 101:24 103:15 105:18 days 21:24 67:25 97:6,10,19,21 De 41:9 deal 29:3 31:16 69:14 dear 64:20 Deborah 77:14 77:19 December 21:8 decent 18:8 decide 63:23 decided 13:25 24:4 43:5 63:25 69:12 decision 40:25 deemed 4:16 defect 3:11 Defendants 1:9 1:16 2:7 definite 21:25 definitely 22:1 26:24 degree 99:3
---	---	--	--	---

deleted 22:24	18:6 25:12,15	discuss 77:12	58:22,24 66:14	D-E-P-I-C-E
denied 95:6,7	32:20,23 33:24	discussed 6:7,10	66:18,19	15:20
dentist 83:11	35:13 36:5 37:1	77:13,18 100:5	doors 45:22	E
101:8	37:3,7,16 38:12	100:8 101:4,6,9	46:23,23 56:19	e 2:1,1 3:5 5:1,1
dentist's 83:13	38:21 39:7,21	101:18	57:2	104:1 105:1,1
department 2:7	40:2 49:4 58:7	discussing	doorway 29:13	earlier 31:25
11:13 64:16,21	63:9 69:6 80:6	100:16,17	30:2,2,5,9	32:17 77:4
66:21 86:4	84:23 95:12	101:10,16	41:24 49:17	effect 4:10 7:19
Depice 15:20,23	96:4 97:13	discussion 77:9	doubt 52:15	64:19
28:21 77:4,11	Diannane 51:16	discussions 6:9	downstairs 39:25	Ehler 13:19 18:6
77:22 78:11,14	Dickey 11:12	distress 85:10	40:1,4,9,10,11	25:12 32:20,23
79:3	95:9	doctor 28:23,24	42:4,19 60:7	39:21 49:4 63:9
deponent 3:10,14	Dictates 60:8	48:14 70:5,11	61:1 64:11	69:6 84:23
3:17,20 4:2,4	died 21:5,5	73:15 76:12	Dr 13:21 16:18	95:12 97:13
depose 99:23	different 9:25	77:25 78:1	23:22,23,25	eight 68:22,22
deposition 3:3,5	10:1 26:1,1	79:15,22 80:15	24:6,10 28:9,16	either 16:15
3:6,6,9,14,21	29:15 54:1,2	81:2,20 82:12	29:1,2 48:15,17	34:21 40:2
4:3 5:21 6:1,3	60:12 89:14	82:13,18,22	48:20 49:1,7,12	50:11
6:13,17,18	differentiate	83:5,15 91:12	50:10 51:2,11	elaborate 17:14
Depositions 3:1,2	87:14	96:10,13,24,24	52:10,23 53:3	electrical 44:3
4:1	direct 3:17 11:23	doctors 50:2	53:13 54:4,12	elevator 45:20,21
deputy 41:13	12:2,18 18:23	56:24 79:10	54:14 55:1,4,7	57:8,13,19
describe 9:23	87:6,8 95:10	81:7,9,10,21	56:18 57:3,11	elevators 46:22
45:9 47:8 86:23	100:2	82:5,10,11,15	57:18 58:2,10	70:23 74:22
described 38:11	direction 3:18	83:9,10 84:5,9	58:17 59:15	Elher 25:15
91:25 92:1,1	directly 10:24	84:12 87:10	62:6,6 63:1	51:16 58:7
Desiree 18:4	director 11:12	100:4 101:13	70:10,17 75:4	Elson 96:19,20
65:10 96:18	17:9	104:9	75:17,20,20	email 42:8 70:4
desk 29:14 45:19	dirt 17:16	documented 28:6	77:11,22 78:4,6	96:16
45:20 46:1,3,24	Disabilities 28:9	DOCUMENTS	78:10,11,13	emails 25:2 31:9
59:5,9 60:4	disc 71:13,15	104:3,4	79:3,6 81:24	Emilio 40:14
61:4	72:7,13 73:13	dog 74:18	82:8,9,13,22	emotional 85:10
destroy 89:11	73:16,16,18,22	doing 10:7 12:5	83:1,15,17,22	87:3 92:16
destroyed 75:10	discovered 92:17	30:17 38:14	83:24 85:24	employed 7:22
85:19,21 86:9	discovering	42:16 53:15	86:2,3 100:6,8	7:25 19:11
92:24 93:2	81:12 85:15	67:18 74:19	100:16,21	employee 99:2
detective 60:10	87:17 90:23	76:12 88:9 91:9	101:3,4,8,9	enforce 3:15
60:18 70:3,11	92:21 94:4	92:10 98:3,14	104:10,10,11	entered 50:9
73:14 91:10	discovery 70:20	dollars 15:8	104:11	entire 12:10 14:4
96:12,23	70:21 73:9	23:11	draw 30:20 31:1	14:5 25:3 75:4
detectives 68:22	80:10 84:11	Donna 22:15,20	Drew 80:25	75:5,19 76:4
determining 4:4	85:11 95:5 96:1	23:2	Drive 5:10	entitled 88:1
devices 56:7	101:17	door 29:9 30:8	driven 25:21	entrance 30:5,6
Devis 96:20	discs 70:23,24	33:6 37:22,25	drove 44:17	33:6,8
diagram 30:21	71:1 72:5 74:2	51:21 52:6 57:1	duly 5:2 105:10	equipment 47:11
Diannae 13:18	74:5	57:3,4,5,21,22	duties 10:4	

Erie 8:11	eye 82:13,22 101:3	filmed 77:2 86:5 87:12 88:15 94:1 96:8	fix 31:10	friends 36:20 67:6 82:4 86:7
Erinburg 71:21			Flemming 40:19 40:20 41:16	front 21:14 30:15
error 3:11	F	filming 70:1,17 75:11 84:24	42:2,19,22 43:2 66:8,8 67:1	37:19,19 38:4
escorted 25:21 26:25	F 105:1	86:19,19 91:6 91:19 96:6 98:4 102:3	floor 2:9 45:18 45:21	39:7 51:4 60:3 60:4 73:7
Especially 74:23	face 13:20 22:18 23:3 94:15	films 70:22	Floyd 17:8,9 18:5 19:8,10 22:14	fully 11:10 56:1
ESQ 2:5,10	Facebook 88:20 89:1,2,24	finally 35:3 69:15 72:9,9,11	focus 29:4 90:21	Fulton 17:21,22 18:6
event 4:6 71:23	facility 19:21	find 85:24	follow 98:3	function 9:14
everybody 10:16 22:1 29:13 30:4 35:2,19 36:20 38:16 40:23 60:16 77:15,18 79:15 83:12 91:20 97:13	fact 14:17 34:1 66:6 70:11 76:18 92:13 93:25 94:1 95:19 96:12,23 98:11	fine 18:15 28:22 32:11 68:21 92:20	follows 5:4	functions 9:20
everyday 89:18	fair 9:3 47:2 69:4	finger 22:17	follow-up 78:24 81:8 83:2 84:1	furnished 4:20
exacerbate 31:11	family 82:3 87:2	fingerprints 71:24	food 22:4	further 4:9,12,15 4:18 99:18 100:1 103:5 105:13
exacerbated 28:8	far 22:2 33:5 54:17 57:14 62:25	fingers 51:18,19	forced 10:14 13:3 13:5,8,10,13 14:1,2,7 16:18 58:14	G
exact 74:8,9 94:18	fast 11:3	finish 6:24 15:16 16:22 24:8 29:24 35:17 36:11 44:14 46:14 48:23 79:10 95:3	forcible 67:13,19	Gary 15:20 28:21 28:23,24,25 38:12 77:6,7
exactly 23:11 25:19 35:9 37:12 50:3 51:15 76:2	father 21:4,5	first 5:2,13 10:2 10:6 12:5,24 13:1 16:1,3,9 16:25 17:1,13 18:10,18 19:5 19:11,15,20 20:11 21:17 22:6 23:20 24:9 25:25 26:5,11 27:6,19,24 29:14 33:17,17 35:24 48:10,21 48:21,24,24 49:20,21 53:1 65:23 70:16,23 74:21 76:9 78:4 92:11	forcing 24:1 43:25	general 3:2
exam 93:8	fault 58:13		forever 72:22	generally 81:18 87:15
examination 1:15 3:12 4:13,19 5:5 14:23 47:15 52:17 53:14 54:5 70:4,9 75:4,15,19 76:4 77:2 80:11 88:13,16 96:9 100:2 103:7 105:9,11	February 74:13		forgot 18:24	generals 60:9,17 60:22 70:12
examine 55:20 75:24	Federal 84:18		form 3:11 6:1,17	Gentil 18:24
examined 5:3 62:9	feel 29:6,10 30:12 79:1 87:14 93:18 100:19		former 80:14	George 20:9,12
examining 3:20	feelings 79:19 80:10 92:1		forth 3:16 4:5 93:11 97:9 105:10	getting 19:4 23:3 23:8 38:20 51:20 55:9 57:8
excuse 9:10	feet 33:7		found 32:8 91:13	girlfriend 75:6 76:24
executive 17:9	felt 84:12 92:10 92:12		four 26:23 72:21	girls 23:17
exemplary 99:2	female 41:18		fourth 16:12,15 26:23 32:6,8	give 7:13,19 15:4 17:7 42:5 43:7 53:19 55:8 63:22 64:1,8,9 72:19 89:15 91:24 96:17
expert 67:12,17	figure 16:23		frame 72:19	given 3:6 12:15 66:7 67:1 105:11
extent 3:11 23:16 90:25	file 23:24 30:23 31:3		framed 3:9	giving 10:25 37:8 73:8
	filed 63:9 84:18 93:16	Fisher 13:21 81:24 85:24 86:2,3	Francis 16:19 23:23,23,25 24:6,10 78:4,4 78:6,11 79:6 83:25 104:11	glass 46:23,23
	files 30:24	five 33:7	Frasca 82:13,22 83:2 101:3	
	fill 20:25 61:25		freak 29:18	
	filled 61:7		free 97:14	
	film 86:10 88:12 88:21 90:8 91:16		Fresca 101:4	

57:2,21,22 Glynn 11:16,18 11:19,25 go 6:20 10:14,18 12:2 14:8 15:2 15:3 16:2,18 18:3,21 20:5 22:18 24:15 25:6,20 27:6,8 28:1,4,16,16 29:2 32:5,7,14 33:9,13 34:1,2 36:2,5 37:25 38:22 39:1 40:9 40:10 41:10,10 41:11,12,12,13 41:14 42:3,5 43:18,19,24 44:19 49:19,20 50:2 52:19 56:11,19 57:1,2 57:4,5,24 61:20 62:4 63:21 64:14,14 65:16 65:18 66:20,22 66:23 67:21,25 68:21 69:17 71:22 79:15 81:21 82:14 85:25,25 87:10 88:8,14 91:8,14 92:11 95:21,22 96:9,14,17,21 97:4 98:18 God 18:1 39:15 56:5 68:11 76:20 77:25 78:1 goes 27:25 39:22 39:23 66:10 67:2,20 going 6:22 7:1,3 13:16 15:22 16:22 19:3 20:6 22:8 25:17 27:1 28:8,11 29:23	30:13 31:10,11 35:8,12 36:17 37:3,9 38:16 39:25 40:3,7 41:4,5 42:23 43:8,18,21 44:12,13 53:5 53:16 55:8 57:23 68:17,21 69:12,15 72:18 73:2,3,6 78:20 81:5 82:25 83:21,23 86:18 88:11 90:15 92:13 93:9,10 95:20,25 98:18 100:25 101:14 Goldman 81:4,8 81:10 82:9 100:21 104:10 Gonzalez 40:14 40:14 69:20 good 5:12,15 7:4 31:18 36:17 58:15 102:5 goodbye 11:14 60:23 gown 56:4 gray 11:9 12:2 58:21 Greenwich 2:9 grief 37:8 grievances 87:16 GRODENTIZI... 2:15 ground 6:21 grounds 4:5 group 13:24 19:2 Guant 70:3,11 73:14 96:12,23 guess 8:16 51:4,6 53:8,10 68:18 69:17 77:9 guesstimate 32:18 gurney 47:13,17	47:20 50:6,11 50:18,23,25 gurney's 47:24 guy 28:5,5 43:20 52:19 57:5 guys 44:1,2,3 68:22 gynecologically 100:11 gynecologist 79:14,21 80:9 80:14,24 100:7 <hr/> H <hr/> H 5:1 halfway 18:8 half-hour 52:12 hallway 57:21,22 57:25 hand 39:22,23 42:25 43:21 49:5,6,12 51:17 51:18 52:18 54:7,8,13,14 55:2,5,21,24,25 56:15,18 57:12 59:13,14,19,22 61:5 64:8,11 66:23 67:16 70:18 105:18 handle 10:5 60:19 hands 33:12 42:21 53:16,16 75:17,25 76:19 hanging 41:24 Hanna 18:5,20 happen 94:17 happened 13:14 19:18 22:5,11 29:5 32:19 34:9 34:13 37:4,6 38:25 39:20 40:21 43:17 49:3 51:13 56:12 60:2	63:13,15,15 65:21 66:5 79:23,24 happens 22:1 32:21 58:21 69:17 101:23 happy 7:11 22:13 23:15 harass 69:10 harassed 17:16 harassing 23:16 harassment 67:13,19,24 hard 76:9,10 99:1 hardest 11:3 Harrington 41:19 head 8:10 17:23 20:11 31:3 70:7 72:23 74:8,12 75:5,12 94:8 healthy 82:17 heck 13:23 42:16 held 1:17 95:14 hell 24:23 hello 11:14 help 17:6,10 18:8 18:17 19:1,3 24:3 25:1,2,3 28:18 60:9,23 66:19 86:1,3 87:22 88:15,15 hereinbefore 105:10 hereto 4:17,19 hereunto 105:17 HIPPA 75:9 78:22,23 81:6 83:1,21,24 99:19 104:7,9 104:11,11 home 14:21 28:18 71:8 73:23 74:16 honest 83:8	honestly 18:11 27:3 36:9 51:25 59:12 77:7 80:13 81:14 82:20 97:8 honesty 75:13 honors 99:4 hour 52:14,15 hours 74:2,2 75:7 76:25 house 71:2,16 73:21 HR 18:1 22:19 28:15 81:25 95:10 Hudson 65:10 70:7 71:19 91:15 95:22,25 96:7,11,18,20 human 10:16 <hr/> I <hr/> idea 17:4 26:7 31:21 32:8 38:17 44:25 45:2,13,16,18 46:11,18 48:3 48:13 50:24 52:11,13 55:16 58:3,9,16 59:11 76:15 83:6 ignored 69:8 ignoring 17:10 17:13 IG's 86:1 ii 3:15 iii 3:16 immediate 8:14 10:9,12 11:19 11:23 immediately 39:5 71:22 impact 101:16 impeccable 23:9 23:9 important 79:2
--	--	---	---	--

87:13 improper 3:16 29:6 inaudible 60:15 81:23 89:14 incident 41:17 66:7,9,24,25 77:23 78:10,14 88:2,3 89:22 90:14 95:18 96:5 98:24 incidents 5:19 include 3:10 80:19 102:8 including 77:14 77:18 78:8 79:7 79:7 incorrect 16:6 64:25 Index 1:6 individually 1:2 individuals 22:9 44:16 information 36:25 104:3,4 initial 65:1 71:6 injured 84:23 injuries 84:19 injury 67:9 85:7 85:9 insane 37:15 INSERT 104:5,6 inspector 60:9,17 70:12 71:25 inspectors 60:21 instant 40:8 instruction 7:5 intentions 44:12 interested 105:15 interfere 3:13 interposed 3:4 interrupt 4:3 interviews 94:7 intimidated 17:16 involved 13:20	13:21,22,22,25 25:11,16 IOD 61:7 irregularity 3:11 Island 19:17,22 19:23 20:5,8,13 21:6,21 issue 29:5 issues 22:3 <hr/> J <hr/> January 8:2 19:13,20 Jeremy 26:11 Jerry 13:12,18 24:20,23 25:8 25:10,20,25 27:14,16 30:23 32:20,21 33:17 33:23 35:6,12 36:5 37:1,3,7 37:12,16 38:12 39:8 40:2,22 41:23 43:18 44:5 64:10 74:24 Jerry's 33:1,2 35:24 37:19,22 38:1,7,8,19,22 39:1,3 44:19 Jersey 1:8 2:8 5:10,17 8:11 43:9 64:6 job 9:8,14 10:1 12:7 18:21 22:20 23:11 89:17 94:14 95:1 jobs 94:19,24 95:4 Johnson 64:16 66:1,4,9,21 67:25 JON 2:14 Journal 23:22 24:11,12 43:10	43:10 judge 4:11 63:25 65:20 67:20,21 67:22,22 68:5 68:10,11,14,16 69:9,11,13,18 69:18 71:7 73:7 87:25 91:17 96:15 July 16:15 June 8:21 12:21 12:22 13:2,6,9 14:10 15:24 16:2,8 27:11,19 29:21 jurat 102:8 justice 2:2,15 69:15 75:13 85:22 <hr/> K <hr/> Katie 94:9,14 KAUFMAN 30:20 keep 20:6 24:2 39:11 43:8 59:22 90:25 91:9 keeps 92:13 Kellerhar 41:8 66:14,17 Kenneth 71:21 kept 19:3 41:20 41:22 Kerelgrand 57:3 Kerlegrand 48:15,17,20 49:2,7,13 50:10 51:2,11 52:10 52:23,25 53:1,3 53:13 54:4,7,12 54:14 55:2,4,7 56:18 57:11 62:6 63:1 70:10 70:17 75:4,17 75:20,21	kind 30:24 39:23 kinds 42:6 KINGS 105:4 knew 28:14 33:14 36:16,19 36:20 49:7 67:18 74:23 know 6:22 7:11 8:25 11:2 12:12 16:11 17:11,24 18:14,15,16 20:14 21:24,25 22:10 23:25 24:24 25:13,19 27:25 28:12,19 30:10 31:22,22 32:9,10,10,11 33:7,25 34:18 35:7 36:7,19 37:6,7,12,13,14 38:6 39:6 40:12 40:15,16 41:14 42:16,23 44:25 45:13 46:16 47:12,19 48:19 48:22 49:9 50:1 50:3,7,13,14,25 51:5,9,18,25 52:7 53:1,2,6,8 53:10 54:11,12 54:12,13,13,16 54:19 55:9,22 56:13,13,14,15 57:14,16 60:1,1 60:13,15,19,21 62:4,13 63:14 63:19 65:12,21 67:5,11,13,14 67:17 71:11 72:15,17,21,23 74:8,9,11,23 75:1,12 76:2,2 76:3,4,13,14,17 76:17 77:8,9 82:18,20 83:11 83:12,15,19	84:8,9 85:17 86:6,17 87:3 88:7,16,18,24 90:4 91:12,15 91:17 92:12,13 92:18 93:17 94:18,21 97:8 98:8,9 101:20 101:21,22 103:3,4 knowing 58:15 83:19 knowledge 63:3 73:12 known 8:10 32:3 32:5 knowns 65:19 knows 37:9 79:16 94:7 know,there 73:3 Kromm 2:10 5:6 5:16,25 6:6 10:21 11:4 21:1 30:18 61:24 78:20,23 81:5 82:25 83:21 99:17 Krulenburg 13:19 18:5 25:12 35:11,21 37:2 <hr/> L <hr/> L 5:1,1 labor 94:14 95:1 ladies 42:12 lair 89:8 90:4,6,9 91:4 92:2 97:1 late 21:8 32:23 35:11 lateral 19:25 20:17,20 latest 100:13 laughed 60:20 Laura 11:16,18 11:18,24
--	---	---	---	--

Lauren 2:15 65:9 65:11 68:5 71:4 73:14 96:14,21 96:22 law 2:7 3:4 85:18 86:20,21 Lawrence 5:10 laws 86:20 lawsuit 25:14,14 74:10 80:1 lay 25:6 layout 45:9 leaning 21:7 learn 66:6 70:16 learned 64:24 66:25 learning 87:7 88:4 leave 19:23 20:24 21:11 27:19 78:2 Leborn 22:15,20 23:3 left 35:5 39:4 42:25 43:13 56:14,15 57:18 57:21 59:24 69:14 leg 39:8 legal 85:22 legalese 90:9 letter 14:22 17:8 17:9 19:8,10 22:14 23:6 31:20 88:16 96:11,22 let's 13:17 level 41:1 63:24 liar 88:21 93:3,4 lied 51:1 91:11 Lieutenant 41:9 66:11 lieutenants 64:13 Lieutenant's 67:3 life 15:22 24:21	24:23 35:6 89:12,14 100:25 101:15 limitation 3:15 Lincoln 8:21 9:25 17:5 19:16 19:17,19 20:18 20:21 21:15,19 22:5,9 24:21 29:19 35:5 61:1 63:14,21,25 64:7,18 66:13 86:2 Lindenmeier 13:18 24:20 25:8,10,20 27:14,16 30:23 32:20,22 40:22 Lindenmeier's 33:17 Lindenmeir 13:12 line 90:22 lines 80:7 listen 66:16 94:21 listened 94:2 LISTENING 2:15 little 12:25 25:6 68:23 75:2 84:8 86:12,15 live 5:22 6:13 86:5 living 24:22,23 74:7 located 8:7 62:18 location 29:16 London 10:18 lonely 68:24 long 7:25 8:18 26:5 35:22 44:23 45:2 46:16 51:23 52:9 54:3 58:1 59:11 63:4 69:3	71:11 longer 11:19 80:16 81:3 look 42:22 43:6 55:20 70:25 73:25 74:4 87:11 88:8 94:19 looked 41:2 43:21 54:7,14 55:25 57:11 62:22 looking 55:2,5 56:18 70:17 74:7 lose 95:21 102:2 102:5 103:2 losing 23:14 92:3 97:3 101:18 102:3 lost 86:7,8,14,24 87:1 89:14 92:5 95:17,23 99:7 101:19 lot 19:2 20:14 77:9 81:21 82:15 87:2 lots 35:2 95:13 101:20 loud 38:20 love 22:1 low 88:12 luckily 82:16 lunch 34:7 43:5 lying 32:9 88:19 90:10,16,17 98:4 L-I-N-D-E-N-... 13:12	MAGNA 2:14 mail 71:1,8,12,13 71:15,17 72:1,2 72:10 maintain 90:21 maintenance 44:2 making 41:21 89:8 management 18:3 29:3 31:16 34:22 85:24 managers 61:9 Marinko 60:10 60:11 Mark 18:7 35:4,7 35:7,14,17 36:10,10,23 37:8,8 marriage 105:15 Martin 13:22 82:1 Martinko 60:11 60:12 Martino 41:9 Mary 53:6 55:1,7 62:7 Mary-Lee 18:5 18:19 matter 69:9,16 101:9 105:16 matters 60:20 89:10 90:24 maze 54:25 56:22 56:23 mean 9:14 14:3 17:14 21:23 27:13 42:9 44:25 49:16 53:2 55:22 67:4 67:12 75:13,24 77:8 84:3,4 85:7 meaning 9:10 84:20 means 9:1,12	12:11 84:6 86:11 90:10 media 89:21 90:5 90:13,13 medical 16:2,8 16:12 17:11 23:7,21,24 24:9 24:19 25:7,21 26:1,9,15,21 29:20 42:23 43:3,4,6,8,15 43:19,19 44:5,5 44:11,15,20,22 46:17 47:3,6,8 47:10,10 49:13 49:14,15 50:1,2 50:9 52:3 53:8 56:7 57:4,14,15 60:3,6 62:5 63:2,18 66:23 70:2,4,9 75:4 75:11,19 76:4 77:2 79:22 80:11 81:11 82:5 83:2 84:5 84:25 85:21,25 86:5,10 88:13 88:15 90:8 91:7 91:16,19 93:8 96:7,8 98:4 99:20 100:10 100:17,23 101:5,10 102:3 medications 7:18 meet 34:11,20 58:1 61:2 69:22 meeting 22:15,21 22:25 23:2 24:10 33:22 34:2 36:13 42:1 42:2,3 48:14 73:9 meetings 88:14 90:18,18 94:1 members 87:2 mental 88:5
--	--	--	---	---

<p>mentioned 9:15 12:4 21:11 31:25 59:13 62:5 82:7 84:9 86:14 87:5 100:4 met 28:4 48:20 Michael 81:4 Michelle 42:14 middle 46:25 millimeter 22:17 million 65:19 76:9 minutes 22:25 35:10 52:12 missed 16:17 23:12 missing 97:20 98:11 99:6,7 mistake 89:12 mistakes 41:21 money 95:21 months 10:7 20:4 28:14 morning 5:12,15 32:24 35:24 36:4,11,12 move 10:21 54:8 75:17,24 moved 29:15 multiple 14:25 Munson 8:16 10:9 11:21,25</p> <hr/> <p style="text-align: center;">N</p> <hr/> <p>N 2:1 5:1 104:1 name 5:7,16 13:24 14:20 15:5,18 17:20 18:2 25:13 26:11 34:18,19 41:20 60:11,13 61:14,23 77:25 78:1,5 80:23 81:1 83:13,15 96:19,20</p>	<p>named 11:16 names 18:9,17 naming 18:10 narrowly 91:1 nasty 66:18 68:11,19 90:1 near 55:15 74:15 need 7:10 25:6 29:11 64:17 66:14,17 70:14 70:24 91:1 93:17 95:3 needed 14:8 43:5 45:22 needless 23:11 needs 90:22 nervous 39:2 41:22 never 14:6 17:17 23:12,25 28:25 32:21,23 36:17 41:19 44:12 49:22 65:6 68:1 68:2 74:23 91:21 new 1:1,1,8,8,19 2:4,4,8,8,10,10 5:3,10,17,17 13:23 25:22 40:13 43:8,15 64:6 69:13 70:9 71:10 100:12 105:3,7 Newark 25:4 newspaper 86:10 89:8 90:7,7 93:3 98:18 nice 89:16 91:13 night 74:6 nighttime 76:24 nine 78:24 NJ 1:18 nonresponsive 10:22 non-civilian 12:11</p>	<p>normal 38:15 normally 32:16 32:17 nose 22:17 53:16 nosing 76:18 Notary 1:19 4:10 5:2 103:17 105:6 note 5:20 22:24 61:2 noted 3:5 5:16 notes 22:3,21,22 22:23 23:23 25:16 notify 27:22 November 20:23 21:8 Novich 13:24 26:11,13,17,17 27:5,6,7 28:5,9 28:16 29:1,2 31:16,22 32:4 43:20 44:7 52:20,22 54:10 54:12 56:13,14 56:17 57:5,6,18 58:2,11,17 59:16 Novich's 28:24 59:24 62:6 numb 51:20 number 103:3 numerous 36:15 69:8 nurse 62:10,12 62:15,17,21 nurses 53:6 63:1 NY 1:18 N.Y.P.D 70:8,10 91:13 95:20,22 96:8,9</p> <hr/> <p style="text-align: center;">O</p> <hr/> <p>O 5:1 objection 3:9,14 53:12 93:20</p>	<p>objections 3:2,2 3:2,5,7,8 obviously 31:24 53:12 75:22 occur 63:12 69:2 occurred 21:18 23:2 27:18 occurring 37:18 October 8:21,22 9:5,9,21 10:3 10:10 32:1 offenses 25:15 office 8:7,9,15 9:4,15,20 10:3 11:24 12:8,14 20:2 23:17 26:2 26:16 28:24 30:2,3 33:1,2,8 33:17 34:10 35:15,21,24 37:13,17,19,22 38:1,2,7,8,19 38:22 39:1,3,3 40:10,12 42:15 46:17 47:4,6,8 47:10 49:13,14 49:15,16,17,18 49:20 50:1,2,2 50:9 52:3 56:7 56:17,21,23,24 57:1,20,25 58:18 59:2,15 59:24 60:9,17 60:22 62:5 63:2 65:3 70:12 72:6 72:13 73:19 86:1 87:11 91:15 92:11 officer 3:5 officers 10:8 12:6 offices 1:17 5:23 6:14 8:19 45:14 56:25,25 57:23 oh 16:5 18:1,11 20:22 22:22,24 24:22 28:14</p>	<p>32:20 34:15,18 43:16 44:18 46:21 53:15 66:11,12 67:3,5 68:11 77:25 78:1 88:21 91:20 92:9 94:10,15 okay 7:4,8 12:19 15:12 16:19 18:16 21:24 22:21 23:4 30:2 30:5 33:23 37:24 42:3 67:9 67:20 68:21 78:8 80:23 82:8 87:4 98:1 Oleg 69:23 Ol sack 94:13 OMS 21:18 22:7 26:3 45:9,25 48:16 62:10 84:1 once 14:6 15:7 16:19 24:7 49:22 89:6 99:19 ones 79:7 open 30:11,12,13 30:16 46:22 48:9 opened 30:6 45:22 71:13 opening 29:12,16 30:3,8,11 opens 23:23 opportunity 28:10 63:22 64:1 92:20 oppose 87:16 opposite 59:9 option 5:25 order 1:17 3:16 20:1,10 44:19 56:12,15 59:18 60:2,15</p>
---	---	--	---	--

ordered 43:19 44:5	91:19 93:9,10 93:11,12,24 100:13	5:22 6:3,13 18:2,3 20:4 26:10 29:8 48:10 77:13,20 86:4	11:17,20 22:17 24:17 31:13 36:4 37:7 38:18 42:11 44:10 47:2 51:8,10 60:2 62:1 65:3 69:11 72:25 76:11 99:17	95:9 possible 58:16 possibly 58:14 77:20 99:22 post 88:20 89:1,2 90:13 94:19 postal 71:25 posted 89:24,25 posts 89:21 practice 3:4 83:14,16 practicing 80:16 81:3
Ortiz 10:20 11:11,15	particular 95:18 parties 4:4,15,19 105:14	personal 28:21 79:11,11	pointed 41:2 police 8:10 10:8 12:6 40:1,4 41:6,10,11,11 41:14,16 42:19 60:7 63:18 64:14,14,15,20 65:22 66:3,12 66:20 71:20,22 85:22 91:13	predicated 15:22 prejudice 3:17 PRESENT 2:13 preserve 3:15 press 40:17 64:17 67:8
outcome 105:16	parts 55:21 93:14	persons 3:12	Policy 60:8	pressed 70:19
outside 48:11 78:6 94:11,16	party 3:20	petty 10:6 12:5,9	politics 69:16	presumably 54:20 80:19
overtime 23:11 23:14	pass 29:9 30:8	phone 14:1 34:17 35:15,22 36:6 36:18 39:9,22 59:22 60:24 61:4 64:16 66:11 67:3,6,16 71:18,20 75:7 76:25	poor 68:23	pretend 68:21
o'clock 35:9 36:18,25	Patalano 22:24	physical 84:19,20 85:5,7	Port 1:8,17 2:7,8 5:17,22 6:13 7:23 8:1,3 9:2 10:19 14:4,5,21 15:2,8 16:7,19 18:2 19:12,15 21:9 22:2,7 23:10 60:8 64:7 68:23 70:12,21 75:8 78:3,6,17 80:2,17,21 81:15 82:9 84:1 84:15 85:4,5,19 85:23,23 86:9 86:17,21,25 87:8,15 88:11 88:17,23 89:3,7 89:10 90:6,19 91:11,20 92:9 93:3,12 96:25 97:20,24 98:3 98:14 99:3	pretty 20:13 52:25 54:6,6,22 62:9 70:22 71:10 72:3,8 77:6
O'Toole 77:14,19	PATC 8:13,19,24 9:1 10:15 20:11 29:12,15 43:3 43:11,22 44:13	physician 79:19 80:9	Port 1:8,17 2:7,8 5:17,22 6:13 7:23 8:1,3 9:2 10:19 14:4,5,21 15:2,8 16:7,19 18:2 19:12,15 21:9 22:2,7 23:10 60:8 64:7 68:23 70:12,21 75:8 78:3,6,17 80:2,17,21 81:15 82:9 84:1 84:15 85:4,5,19 85:23,23 86:9 86:17,21,25 87:8,15 88:11 88:17,23 89:3,7 89:10 90:6,19 91:11,20 92:9 93:3,12 96:25 97:20,24 98:3 98:14 99:3	primary 79:15 79:18 80:9,15
P	path 37:23	physically 72:4 85:9	politics 69:16	print 89:5
P 2:1,1	pathway 38:6,7	picked 73:22	poor 68:23	prior 17:22 19:17 31:11 32:8 64:6 77:8
PA 16:2,8,10,13 16:16 23:20 24:9,18 25:7 26:9,15,21 42:23 43:3,3,6 43:8,14,19,19 44:5,5,11,15,20 44:22 79:7 85:25	Patrick 18:5 19:8 19:10 22:14	pictures 30:22,23 30:24 71:12	Port 1:8,17 2:7,8 5:17,22 6:13 7:23 8:1,3 9:2 10:19 14:4,5,21 15:2,8 16:7,19 18:2 19:12,15 21:9 22:2,7 23:10 60:8 64:7 68:23 70:12,21 75:8 78:3,6,17 80:2,17,21 81:15 82:9 84:1 84:15 85:4,5,19 85:23,23 86:9 86:17,21,25 87:8,15 88:11 88:17,23 89:3,7 89:10 90:6,19 91:11,20 92:9 93:3,12 96:25 97:20,24 98:3 98:14 99:3	privacy 47:23
package 71:8,23	pay 28:3 30:17 97:24 98:17	piece 42:6	politics 69:16	privilege 3:15
page 102:7 104:4	Pearson 18:25	place 70:9	poor 68:23	probably 21:10 81:23,25 82:12
paid 97:11,19,21 97:22 98:1,7,8 98:11,16,20 99:7,10,12,14	penalized 95:14	places 97:4	Port 1:8,17 2:7,8 5:17,22 6:13 7:23 8:1,3 9:2 10:19 14:4,5,21 15:2,8 16:7,19 18:2 19:12,15 21:9 22:2,7 23:10 60:8 64:7 68:23 70:12,21 75:8 78:3,6,17 80:2,17,21 81:15 82:9 84:1 84:15 85:4,5,19 85:23,23 86:9 86:17,21,25 87:8,15 88:11 88:17,23 89:3,7 89:10 90:6,19 91:11,20 92:9 93:3,12 96:25 97:20,24 98:3 98:14 99:3	problem 19:16 23:14 93:11
Palatano 16:18 17:2,4,22,23 18:6,19 22:13 22:14,16,25	pending 7:13	plainly 3:16	Port 1:8,17 2:7,8 5:17,22 6:13 7:23 8:1,3 9:2 10:19 14:4,5,21 15:2,8 16:7,19 18:2 19:12,15 21:9 22:2,7 23:10 60:8 64:7 68:23 70:12,21 75:8 78:3,6,17 80:2,17,21 81:15 82:9 84:1 84:15 85:4,5,19 85:23,23 86:9 86:17,21,25 87:8,15 88:11 88:17,23 89:3,7 89:10 90:6,19 91:11,20 92:9 93:3,12 96:25 97:20,24 98:3 98:14 99:3	problems 21:17 21:21
Paper 42:6 88:21	people 12:12 13:21,25 18:17 19:1,3 22:4 23:14 24:3 25:11,16 31:4 35:2 36:15 38:13,14,14 42:9 53:4 62:19 69:8 73:6 81:18 81:25 82:3 85:18 86:24 88:14,19 89:15 90:1,15,16,18 93:2 101:12	PLAINTIFF 1:15	Port 1:8,17 2:7,8 5:17,22 6:13 7:23 8:1,3 9:2 10:19 14:4,5,21 15:2,8 16:7,19 18:2 19:12,15 21:9 22:2,7 23:10 60:8 64:7 68:23 70:12,21 75:8 78:3,6,17 80:2,17,21 81:15 82:9 84:1 84:15 85:4,5,19 85:23,23 86:9 86:17,21,25 87:8,15 88:11 88:17,23 89:3,7 89:10 90:6,19 91:11,20 92:9 93:3,12 96:25 97:20,24 98:3 98:14 99:3	procedurally 64:25
paperwork 66:22 89:7	perfect 14:6 21:24 89:18	Plaintiffs 1:4 2:3	port 10:22	proceed 3:6
Paramus 5:10	perfectly 83:8	plan 43:24	position 9:14 19:25 20:18,19	proceeded 22:16
Park 26:3,16 28:5 43:24 44:6 44:11,15,22 45:3,10	performing 54:5	please 5:7,9 7:11 10:21,24,25 11:5 15:10,16 18:13 20:7 22:12 24:8 25:17,17 29:24 35:17 36:11 46:14 48:23 88:3 90:25 99:4		
part 30:10 73:2 77:11,22 78:18 85:5 88:22	period 27:17	plus 85:20		
	permanent 20:18	pocketbook 34:7		
	permitted 3:12 16:22	point 7:11 10:13		
	person 3:7,17			

process 73:9	public 1:19 4:10	3:13 90:22	79:13,17 94:24	referred-to 11:6
professional	5:3 20:2 103:17	questions 3:14	95:4	referring 13:6,9
100:18	105:7	5:18 6:23 7:6	receive 31:20	17:12 43:1 69:5
professionals	pull 22:16	48:19 99:18	99:19	71:3 73:5 75:16
81:11 82:5	pull-up 21:9	100:1	received 12:7	99:5,6
program 22:19	purely 73:10	quick 6:21	61:3 72:25	reflect 23:1
promoted 86:8	purpose 4:3,4	quite 8:5 24:25	reception 45:19	refrigerator 50:4
91:3 93:1,7,18	purposes 4:13	35:22	45:22,25 46:19	refusal 3:14,18
95:16	80:4		46:24 47:6	refused 63:20
promotion 98:25	pursuant 1:16	R	48:11 57:2,9,24	68:19 70:6
promotions 94:4	3:3,7	R 2:1 5:1,1 105:1	57:24	refusing 25:1
95:8 99:6	push 38:24	raise 53:11	recollection 9:6	87:22
pronouncing	pushed 8:20	raised 3:9	16:14 20:16	regarding 89:21
5:13	67:15	ran 42:12	31:23 38:9	regards 93:16
proper 65:20	pushes 38:23	reaches 39:21	49:11 51:25	regularly 102:5
68:7	put 12:21,22 14:4	read 11:4,7 66:9	58:19 59:17	reimburse 15:9
prosector 68:24	25:14 27:7 31:2	90:10	record 4:6 5:7,9	relate 97:2
prosecutor 65:7	33:20,21 39:10	reader 70:25	5:20 8:24 69:11	related 55:24
65:8,9,11,12,13	40:20 56:3 61:2	reading 90:12	83:23 105:11	85:11 91:5,5,6
65:14 68:2,10	61:24 71:22	ready 42:11	recorded 79:19	91:18,18
68:17 69:22	72:1 74:10 86:9	real 6:21,21	80:10 93:7	105:13
70:2,8,20 71:5	88:20 89:25	19:18,18	recording 56:6	relates 90:8 91:7
71:6,7,17,19	93:3,11 103:3	realize 28:12	70:16 75:16	relation 33:2
72:1,4 73:9	putdown 34:6	really 19:1 37:14	80:20 82:4	56:17
91:15 95:22	puts 67:18	63:14 80:14	85:15 87:17	relations 87:19
96:1,11,15,18	putting 14:7	82:15 94:8	88:1,5 89:22	relationship 92:3
96:21 98:5	41:16 60:7	rearranged 28:7	90:24 92:17,22	relationships
prosecutors 65:3	76:19	29:7 30:14	93:17,17,19	86:7,24 92:5
prostitutor 69:18	P.M 103:6	reason 4:6 28:19	94:4,5,24 95:5	relatively 82:17
protected 29:11		99:1	95:6,8,11,17	relay 36:25
prove 96:9	Q	Rebecca 13:19	96:2,14 98:24	relief 3:7
provided 3:18	quantify 101:18	18:4 25:12 32:9	recordings 73:19	remainder 3:20
4:13,15	101:21	34:19 35:11,11	75:22 76:23	remember 14:20
proving 95:20	quarters 8:10	35:20 37:2,9,11	77:12,23 78:15	15:5 19:2 20:14
psychiatrist 14:9	20:11	37:11,12	79:25 81:12,13	25:13 27:3 46:9
14:14,17,24,25	question 3:16,20	recall 7:19 17:24	82:7 84:10,11	46:12,15 47:24
15:1,2,6,13	4:5 6:24 7:13	19:5 23:4 36:9	85:11 92:7	48:1,4 49:24,25
16:3,4,8,9 27:8	7:14 9:13 10:23	36:22 39:12	records 14:21	50:5 51:6,7
78:7 79:4,12	10:24 11:5,7	40:5 45:19 46:4	21:13 61:16	52:19 53:17,18
psychiatrists	15:11,16 21:20	48:14,25 49:1,3	83:2 84:5 99:20	54:24 56:13
78:9 81:11	29:24 45:1	49:9 50:24 52:8	99:24	62:14,17,21
psychologist	46:15 59:1,2	54:10 55:4,6,19	reference 72:19	64:12 72:18,20
13:23 78:7 79:4	77:16 80:4	56:16 58:4,12	90:23	72:23
82:6 100:6	81:17 82:8	59:11,14,20	referenced 77:4	reminder 44:14
psychologists	93:21 98:15	61:13,18 62:25	referred 24:18	repeating 79:2
78:10	questioning 3:10	63:3 74:19 76:3	25:8 99:21	rephrase 9:13

14:5 report 15:4 41:17 41:17 60:7 61:7 66:7,9,24,25 reporter 7:1 11:1 11:8 reporting 11:18 reports 90:13 representative 34:12,21 representing 4:20 reputation 75:10 86:11 89:9 92:23 93:2 reputations 86:9 request 3:10 5:23 REQUESTED 104:3 requesting 31:9 requires 83:25 reservation 99:25 reserve 99:18 reserving 99:22 resources 10:16 respect 4:16 respected 63:18 85:18 respective 4:19 response 34:14 41:7 51:14 85:20 104:9 responses 81:7 responsibilities 10:1,4 12:4,7 12:13 42:7 rest 52:3 restricted 3:8 result 86:23 87:6 87:8 92:16 93:7 95:6,8,11,16,18 97:3,20 98:12 98:24 results 14:23 55:17	retaliation 42:10 retire 69:12 retired 69:20 retires 69:18 return 14:16 24:12 revealing 6:8 review 73:19,20 revolved 24:25 RICHARD 2:5 ridiculed 92:6 ridiculous 67:23 right 3:7,15,20 5:13 11:21 20:1 20:10 29:2,4,23 30:3,4,9 37:19 38:4 40:11 41:3 43:23 48:7 50:21,23 52:4,5 57:12 62:12 63:23 64:20 66:21 71:9 73:25 74:14 75:21 80:1 94:11,15 99:19 99:22 rights 4:15 rings 60:16 rip 39:22 51:16 67:15 ripping 41:22 rise 41:1 Robin 13:22 82:1 role 9:19 room 22:15 34:15 42:12,13 46:22 51:23,24 51:24 54:2,20 54:22,23 62:8 66:10 67:2 69:15 74:7 100:11 Rosen 94:10,15 rotten 75:8 80:2 80:17 87:22 88:23	Rubenstein 80:25 81:7 Rubinstein 81:9 82:9 100:7,8,16 104:10 ruined 86:7 rule 3:3,5,12,12 3:18 rules 3:1,4 4:1,5 6:21 runs 58:22,24 <hr/> S <hr/> S 1:18 2:1 safety 20:3 saga 100:14 Sandra 10:19 11:11,14 sat 39:5 41:20 50:14,20 saved 23:9 saw 15:7 48:10 52:6,25 53:1 54:10,12,12 56:13,14 61:20 62:25 64:11 68:2 70:1 72:15 76:22 81:21 91:10 saying 21:16 23:6 49:10,10 52:7 64:9 68:20 81:20 89:7 says 23:4,23 29:2 40:25 42:2,6,14 58:23,24 60:18 66:10 67:3,9,10 67:13,22 69:11 scaring 23:3 Scotty 66:14,17 screaming 37:10 38:21 39:7,11 39:13,14,17 51:17 64:13 screen 89:20,23 seat 54:17 55:15	seated 51:3,22 52:2,9 53:3 59:5,8 seats 46:20 second 16:5,7,10 24:19 25:7,23 25:25 26:8,15 27:6,9,11,13,14 27:18 62:4 secretary 8:6 section 4:5 sections 4:16 securities 92:11 security 8:10 20:2 see 6:25 14:8,13 14:17,19,25 15:21,23 16:3,4 16:18 18:11 23:22 24:5 26:9 27:8 29:13 30:13 32:4,6 38:16 43:19 49:21 52:17,19 52:22 53:4,7,10 56:6 57:3,5 61:10 63:5 73:6 75:3 76:6,9,10 76:10,11,16 78:1 82:13 83:7 88:20 seeing 15:13,19 48:4 77:7,8 89:5,6 seen 77:6 sees 43:2 send 17:11 22:23 24:4 70:6,6 88:16 96:22 sending 61:5 sends 44:1,1 senior 8:5 9:16 sense 23:19 sent 14:22 16:7 16:10,12,16 19:8,10 21:18	22:7,14,23 23:7 23:20,22 24:24 24:24 25:7,22 26:6,8,17,21,24 26:25 27:1,5 29:20 30:23 34:15 40:19 70:3 71:1,8,16 separate 52:2 56:21 83:25 93:13,15 98:15 Sergeant 40:19 40:20 41:8 42:19 64:16 66:1,3,7,8,9,21 66:25 67:25 sergeants 64:13 series 6:23 set 3:15 4:5 10:4 70:23 71:1 72:5 105:10,17 settled 69:13 seven 32:18 shaken 41:21 SHARELL 105:6 105:21 shock 39:24 shocked 74:21 75:7 short 27:17 shot 30:19 shots 89:21,23 show 32:22 40:23 68:23 showed 43:2 49:6 51:19 showing 49:12 shows 40:22 66:23 sic 8:17 13:19,24 16:18 18:7,24 18:25 22:21 38:2 40:14 41:8 41:9,19 60:10 64:5 65:9 69:23 70:3 71:21
---	---	--	---	---

77:14 82:13 83:15 94:13 100:11 sick 14:6,8 sic]stops 42:14 side 30:16 34:13 43:9,15 56:19 56:20 57:14,15 57:21 59:9 62:6 62:6 63:1 sign 68:4 signed 4:10,10 significant 3:17 similarly 1:3 simple 67:8,19,23 68:7,18 single 75:20 77:13 sit 33:13,13 41:18 45:23 46:7 47:13 66:4 sitdown 50:11,14 50:15,16 74:4 site 89:3 sits 67:7 sitting 23:15 39:9 40:15 42:20 51:9,12 74:6 situated 1:3 situation 95:12 sleep 86:8,14,16 87:1 88:10,13 93:4 101:18,19 101:20 102:2,5 102:5 103:2 sleepiness 90:3 91:25 sleeplessness 90:12 slip 64:9,9 slow 49:19 slowdown 11:1 43:7 Smalls 18:25 smashed 66:18 social 89:21 90:5	90:13 soft 67:9 somebody 10:15 17:6 24:18 27:22 30:16 31:24 35:1 43:5 46:1,3,5,6,7,16 47:3 53:7 58:23 59:21 61:10 71:13 72:2 76:3 89:24,25 91:10 94:10,16 100:19 someday 60:21 someone's 77:1 soon 39:3 71:16 sorry 11:2 13:14 17:8 32:1 38:12 40:25 58:25 60:18 78:5 87:3 88:25 91:18 sort 49:19 70:17 sorts 76:12 Soto 2:5 5:21,24 6:5,8 8:23 20:24 53:11 64:4 78:2,22 93:20,23 100:3 103:5 sought 79:11 sound 74:14 South 26:16 44:6 44:11,16,23 45:3,11 space 29:1 61:24 speak 11:2 26:12 44:7 46:1 48:16 48:23,24 58:17 65:14 66:15,17 75:22 86:12 speaking 3:8 35:14 49:1 50:10 100:22 special 70:25 specialist 61:6 63:6 66:24	100:6,22 101:3 specific 88:7 94:24 95:4 specifically 10:16 80:8 87:16 spiting 22:4 spoke 26:16 28:9 35:14 36:23 41:19 48:17,21 52:23 58:4 65:6 65:9,10,25 68:5 80:5,16 81:12 81:13,15 82:22 83:4,17 spoken 46:4 64:2 78:9,14 79:14 79:14,18,21,22 80:8 82:3,6,10 84:10 sporadic 15:21 Square 23:22 24:11,12 43:10 43:10 SS 105:3 stairs 40:11 42:1 42:2 stand 73:7 93:12 standing 37:10 51:4 59:10 60:14 staring 41:25 start 6:25 7:2 10:7 13:17 44:15 started 6:22 8:2 11:11 21:5,15 23:16 37:7 42:20,21,21 71:11 90:19 starting 41:23 51:18 starts 66:4,5 67:1 state 1:1,19 5:3,7 5:9 41:6 105:3 105:7 stated 3:9 4:6	statement 3:11 3:19 41:15 statements 3:13 Staten 19:17,22 19:23 20:5,8,13 21:6,21 stating 70:4 96:11,23 station 65:22 66:3 71:22 stay 55:13,15 69:12 stayed 45:7 step 13:4,16 27:4 49:20,20 82:21 Stephanie 18:4 65:10,13 96:18 96:19 Steve 23:3 24:23 60:12 steven 16:17 17:2 17:4,22,23 18:6 18:19 22:13,14 22:16,24,25 STIPULATED 4:9,12,15,18 stole 71:15 72:14 stolen 72:10 stoop 88:12 stop 17:17 24:3 25:1 40:6 68:20 92:9,14 stopped 11:17 stories 45:12 Street 2:9 8:11 stress 87:5 90:12 92:1 stressed 87:2 strike 10:22 stroke 80:16 81:4 stuck 45:1 stuff 19:18 21:25 25:16 33:12,20 33:21 34:1,5,8 53:17 55:23 71:25 73:3	76:13,18,19 90:1 94:7,20 100:12 subdivision 3:3,5 3:18 subject 3:6 99:25 subpoenas 69:9 Subscribed 103:14 successful 85:19 succinct 3:19 succinctly 3:9 4:6 sudden 75:3 Sue 83:15,17,22 101:8,9 104:11 suggest 3:9 Suite 2:4 supervisor 8:14 10:10,12 11:19 18:23 supervisors 11:24 87:19 supplemental 78:22,23 81:7 104:7,9 supposed 11:10 12:23 28:1,4 31:4 69:17 SUPREME 1:1 sure 7:9 8:5,6 14:21 16:13 18:20 20:10,13 21:13 24:25 25:12 26:23,24 26:25 27:2 33:12,16 35:22 38:13,17 41:13 48:18 52:25,25 54:6,6,23 56:12 57:7 59:10,17 61:22 62:9 65:2 66:2 68:15 71:10,13 72:3,8 77:6,10,24 81:24 84:13,15 84:16 85:2 94:6
--	---	--	--	---

94:6,7,9 surveillance 70:24 suspicious 71:23 swear 72:9 76:20 77:7 swell 51:19 swelling 42:22 49:6 59:22 switch 20:20 sworn 5:2 103:14 105:10 system 85:22,22 91:8	98:15 99:5,14 99:21,23 103:10 talk 42:8 48:21 58:10,22 77:23 84:7,11 91:6 100:20 talked 28:20 31:17 34:17 58:6 66:16 77:24,24 78:16 80:13 82:7 94:1 talking 7:2 9:11 25:23 41:25 52:10 66:18 73:8,10 75:3 81:18,19 82:5 92:15 94:23 96:1,4 97:15,21 98:10 talks 58:22 tampered 71:14 72:2 tangible 86:13,22 88:4 92:21,23 tape 74:23,25 75:21 76:5,10 taped 39:16 70:5 tapes 73:4 taping 39:15,18 39:19 TBA's 23:15 TBT 17:10,13 tech 9:4 Technical 9:2 technically 11:10 tell 14:12,13 15:7 18:11,20 19:2 21:10 22:12 27:22 31:19 32:3 35:12 36:16,21 37:3 43:18 44:8 49:7 51:14 53:17 55:7,17 64:3 66:5 67:7 81:22	82:13,18 83:7 83:11,12,19 85:14 86:15 88:4,15 92:18 92:20 94:2,8,12 telling 14:8 22:6 41:10 54:18 79:22,24 83:7 tells 66:21 temperature 76:7,14 temporary 19:25 20:3,9 Ten 34:23 35:9 36:17,25 term 8:25 terminal 35:5 terms 9:19 terrible 74:24 80:21 87:22 testified 5:4 testifying 4:20 testimony 7:20 73:8 105:11 thank 5:12,15 56:5 76:20 therapist 15:14 15:15,18,21 16:19 26:11 28:21 31:17 57:15 77:4 78:7 79:4,11,16 82:6 therapists 78:9 81:10 therapy 60:5 therefor 3:19 thing 10:14 17:11 28:25 30:15 31:5 37:13 47:17 49:21 58:24 63:23 71:11 75:5,20 80:1,2,17,21 81:23 88:23 92:12 93:14 101:7	things 12:16 22:8 29:11 42:6 47:12 53:15 55:23 74:24 75:8 87:9 90:19 91:9 94:22 95:13 100:3 think 8:21 9:6 12:22,23 13:20 18:24 20:12 26:11 33:11,12 33:19,20 34:19 35:3 36:14,15 36:21 46:21 50:4 55:22 60:10 61:21,21 61:22 63:4 72:9 72:10 73:17 74:15 77:20,25 78:5 82:16 83:10 87:10 91:4 92:10,12 93:2 95:13,24 thinking 33:21 69:15 90:16 third 16:11,12,15 26:20,22 27:9 27:15 32:2,4,6 thought 40:20 41:16 67:17 88:19 89:13 90:17 thousands 23:10 23:10 threatening 22:20 three 19:14 24:25 26:23 41:19 68:14,15 75:7 threw 22:22 42:13 71:14 throw 42:11 thyroid 80:15 81:1 100:22 tide 35:8 time 1:13 11:17 11:20,24 12:7	13:5,17 15:19 16:1,3,7,9,10 16:12,16,25 17:1,3,13 18:10 18:18,23,25 19:5 20:2 22:7 23:20 24:9,16 24:17,19 25:7 25:22,23,25,25 26:6,8,14,16,20 27:6,6,9,10,11 27:13,14,15,17 27:18 28:15 30:16 31:21 32:14 35:22 38:18 44:10,10 47:2 62:1 63:4 63:8 64:24 68:16 69:16 71:11 72:15 77:3,6 82:21 91:10 95:20,20 95:23 97:5,12 97:12,13,14,23 97:25 98:2,9,13 98:21 99:9,10 99:11,13 times 24:5,25 26:12 28:17 65:20 68:14 69:8 76:9 97:8 102:1 103:1 tingling 42:21 49:6 51:20 tissue 67:9 title 8:3 9:8,10,14 9:17 TJ 69:23 today 5:18,21 6:12,20,23 7:20 69:25 87:12 97:17 99:21 told 10:16 11:13 22:18 23:12 25:20 27:7,8 28:22,25 31:15
---	---	--	---	--

31:16,22,23,23 32:1 34:3,11 35:11,12 36:5 37:2,2,4 40:3 40:16 49:4,4,5 51:15 55:10 59:22 60:13 63:19 66:13 70:2,3 71:21 82:17 84:13 85:25 90:3,4 91:14 92:5,25 94:9 95:2 96:16 98:17,18 99:9 tools 47:11 top 72:23 74:7,11 85:20 88:22 94:8 Torres 77:14,19 total 27:15 totally 9:25 10:1 touch 38:23 52:5 touched 55:23 76:1 touching 53:16 67:14,19 76:12 tour 35:8 town 71:21 trade 2:9 12:11 traffic 45:1 training 10:8 12:6,10 transcript 4:10 7:4 61:25 transfer 69:19,24 transferred 35:4 69:21 Transit 64:6 trapped 29:10 30:14 Trasillo 64:5 66:12 travel 10:8 12:5 traveling 12:10 treated 17:16 78:13 91:12,15	91:17 treating 77:3 treatment 77:11 77:22 100:9,23 101:5,10 trial 1:15 4:13 68:22 69:1,3,5 69:5 72:20,22 73:1,2,5,10,11 tried 10:17 17:17 18:8 67:15 71:24 trip 24:9 true 105:11 trust 84:14,15 85:17 100:19 101:13 102:4 truth 75:13 92:13 92:14 truthful 7:20 80:13 try 10:25 11:3 29:4 65:20 72:7 72:19 87:14 88:14 89:11 93:13 94:3 trying 7:1 11:22 16:23 17:6 25:1 25:19 51:16 68:6 70:15 73:17 74:24 82:15 84:4 93:15 tunnel 8:21 9:25 10:18 19:16,17 19:19 20:18,21 21:15,19 22:9 24:21 29:19 61:2 63:22 64:7 64:18 86:2 turn 38:22 turned 64:10 turns 41:17 86:3 twenty 76:8 twice 68:5,15 two 11:23 24:24	44:1,2,16 45:6 46:22 62:25 68:14 75:7 types 7:18 60:19 T.V 73:6 U uh-uh 7:7 ultimate 69:5 um-hmm 7:7 unknownst 70:21 understand 7:15 21:20 30:1 57:16,17,23 86:6 91:4 Understood 10:2 58:1 undress 56:3 unfortunately 22:2 35:4 UNIFORM 3:1 4:1 union 34:22 36:16 69:19,21 69:25 73:13,16 unpack 12:25 update 100:13 updated 81:6 104:9 upper 18:3 upset 39:2,6 42:11,17 75:2 93:4 upstairs 42:3,5 43:18 45:5,8,25 64:8 Urgent 82:18 83:4 use 95:19,23 97:14,17 98:2,9 98:13 99:9 usually 32:22 utilized 4:13 U7n 34:25	V vacation 95:20 95:23 97:12,18 97:21,23,24 98:2,6 vacations 98:1 van 44:1 45:7 verbally 7:6 video 46:13 62:23,24 90:24 91:12 100:23 101:4,17 VIDEOGRAP... 2:14 videos 72:25 videotape 87:9 videotapes 87:7 videotaping 100:5,8 viewed 75:15 76:6 79:25 violations 75:9 virtual 6:1,17 visit 28:18 voicemail 43:13 W wages 95:17 97:3 98:23,25,25 99:7 wait 16:5 29:24 45:23 waiting 32:21,25 47:4 60:25 waived 3:4 4:16 walk 39:2 57:22 walked 30:7 40:12 45:18 walking 29:8 30:8 38:13 53:4 walkway 30:6 wall 30:7,8 47:1 wanna 28:17 want 5:20 6:16 6:19,20 8:16 12:18,25 13:4	13:13 16:21 18:19 19:8 20:22,24 21:4 28:2 30:20 31:21 40:17 46:22 52:24 53:11 60:19 61:19 63:14 65:21 67:7 71:9 85:2 86:12 87:4 91:14 92:8 93:5 93:13 94:10,14 94:16 100:3 wanted 6:2,12 33:20,21 36:5 44:6 89:15 95:9 wants 38:16 Washington 20:9 wasn't 19:4 24:14 31:10 35:8 37:8 48:6 50:18 70:4,5 73:15 75:2 80:14 91:11 96:24 watch 76:8 WATTS 2:14 way 12:3 17:21 23:12 29:16 39:22 49:17 51:23,24 57:6 57:16 59:21 63:17,17 69:3 80:12 91:17 105:15 Waylon 8:16 10:9 11:21,25 12:1 ways 86:13 WEBX 2:15 Weehawken 41:4 41:5 63:10 64:15 65:7,8,15 66:20 68:2,6,24 69:8 70:2 71:7 71:17,25 72:2,4
--	--	--	---	--

73:3 77:21 96:15,16 week 61:21,21 72:21 102:1 103:1 weekend 71:10 well-being 88:6 went 8:22 10:2 16:9,23 17:7,19 17:21,24 18:1,1 18:4,21,25 20:8 20:12,17 23:5,5 25:2,4 26:14,15 27:7 32:4,11 33:16 34:3,9 35:24 38:19 39:25 40:10,11 42:12,17,18 44:4,15 45:5,8 45:21,24 48:11 57:3 59:18 63:5 63:5,8,13 64:7 64:8,11 65:19 66:12 68:5,12 68:13,14,15,16 68:24 69:3,7 70:7,8 72:4,6 72:13 73:22 74:22 78:4 81:3 81:22 90:17 92:10 96:7,8 97:9,13,14 weren't 23:15 45:1 100:16 we'll 21:11 25:5 42:4 78:24 84:1 we're 5:18 7:11 9:11 13:16 25:17,23 42:25 68:21 78:20 81:5 82:25 83:23 85:3 92:15 94:23 97:15 WHEREOF 105:17	white 64:10 wide 48:9 wider 46:21 wish 39:15,15 withdrawn 14:12 16:1 46:15 54:3 55:13 witness 4:20 5:2 11:2,9 30:22 64:3 78:3 84:3 93:22 100:10 103:7 105:9,12 105:17 wonder 61:23 87:11 wondering 88:11 words 11:18 41:19 work 8:9,20 10:15,18,19 12:22,24 13:1 14:16 15:3 20:4 21:24 23:9,9,13 23:13,18 24:13 24:14 26:14,17 27:23 28:1,4,11 29:1,2,12 31:10 31:12,15 32:7 32:11,14,17,22 33:15 42:7 61:3 61:8 64:10,18 64:18 67:5 70:25 89:12,19 90:15 92:11 97:20 99:7,8 worked 19:17 44:2 98:22 workers 61:6,11 63:6 working 8:18 9:4 10:5 11:12 12:19 24:16 29:20 31:14 32:16 works 12:3 13:20 99:1	workspace 28:22 58:13,15 80:2 world 2:9 12:11 99:1 worried 86:17 88:10 worry 67:6 68:17 worse 35:6 wouldn't 17:6 18:21 21:23 29:10 36:9 39:16 59:23 68:19 70:25 86:25 92:9 96:17 wow 87:11 wrap 75:5,12 wrapped 59:14 59:15,19,20 wreck 87:3 writes 67:10 writing 25:2 28:15 41:15 42:20,21 66:5 67:1 78:25 81:8 83:3 84:2 written 23:1 60:13 wrong 98:3,14 wrote 17:8,9 22:25 23:5 31:9 42:9 90:1 <hr/> X X 1:2,10 104:1 x-ray 54:15,18 55:10,10,15 x-rays 53:19,20 53:20,21,22 54:4,9,11,11 55:8,12,13,18 56:10 <hr/> Y yards 78:24 yeah 10:6 12:9	24:20 28:14 34:3 41:11,12 43:2 44:18 46:21 47:5,18 48:15 53:20 54:2 61:15 73:13 74:15 78:24 95:1,7,12 95:21 97:17 98:2,13 100:19 101:25 year 19:9 21:8 72:17 years 9:18 17:2 19:14 24:20 39:17 71:10 72:21 77:5 82:16 85:25 101:13 yelling 37:15,17 38:15 40:23 York 1:1,1,8,19 2:4,4,8,10,10 5:3,17 13:23 25:22 43:15 70:9 105:3,7 yup 7:16 8:13 <hr/> Z Zanobia 64:9 Zonabia's 38:2 zoom 5:25 6:17 <hr/> 0 00909(JPO) 1:7 <hr/> 1 10:14 1:13 10006 1:18 10007 2:4,10 107652 5:11 11 21:7 12 8:22 21:7 12:22 103:6 14 1:12 14th 105:18	150 2:9 1902 2:4 <hr/> 2 2 74:13 20 103:15 104:5 2009 8:2 19:13,20 21:5 2010 21:5 2011 21:4,6,19 2012 19:9,9 21:19 2016 5:19 8:22 9:5,9,21 10:3 10:10 12:19 13:1,2,6,9 14:10 15:24,24 16:2,15 27:11 27:19,20,23,24 28:1,3,4 29:21 32:12 79:20 80:11 2017 72:16 74:13 2020 1:12 105:18 207 5:10 22 95:9 221 3:1 4:1 221.1 3:2 221.2 3:14 4:5 221.3 4:2 225 2:4 23rd 12:21,22 24th 2:9 241 8:11 26 90:18 93:25 27 90:18 <hr/> 3 3 27:24 28:4 3rd 28:20 31 3:7 3115 3:3,12,18 350 15:8 <hr/> 4 4 2:9 5:19 13:1 15:24 27:23
---	--	---	--	---

28:1,3 32:12
4th 12:19,23
27:20

5

5 8:2 19:13

6

62 104:6

7

7:30 32:17,18

8

81 104:7,10

82 104:8

83 104:11